



SREE SUMANGALA METALS AND INDUSTRIES (P) LTD

(Aluminium Division)

B-51, SIPCOT Industrial Complex, Pappankuppam Village, Gummidipoondi,
Tiruvallur - 601201, Tamilnadu, India.

ESG - Sustainability Management System Policy Manual

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AMENDMENT SHEET

DATE	ISSUE NO	REV NO	REASON	REMARKS
03 rd May, 2024	01	00	Initial Issue	-
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**ESG - Sustainability Management
System Policy Manual**

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1. Efficient Waste Management Policy

SSMI-AD/ESG/POLICY-01

1. Purpose

The purpose of this ESG Waste Management Policy is to outline SSMI-AD's commitment to minimizing the environmental impact of its operations by managing waste, especially hazardous and non-hazardous industrial waste, in a safe, compliant, and sustainable manner. It aligns with our overarching ESG goals to reduce pollution, ensure worker and community safety, and promote circular economy principles.

2. Scope of Application

This policy applies to all employees, departments, suppliers, contractors, subcontractors, and stakeholders involved in SSMI-AD's operations. It covers the production, handling, storage, disposal, and transportation of waste related to non-ferrous alloy ingot manufacturing across all SSMI-AD-operated or contracted sites, including factories, offices, warehouses, and waste facilities in India.

3. Governance

The ESG Waste Management Policy is overseen by the Sustainability Governance Committee, chaired by the Head of EHS. The committee includes cross-functional members from operations, procurement, compliance, and human resources, ensuring integrated decision-making, policy implementation, and continuous improvement in waste management practices across all areas of SSMI-AD's operations.

4. Definitions

✿ Hazardous Waste

Hazardous waste refers to materials that pose significant risks to human health or the environment due to their toxic, corrosive, flammable, or reactive properties. These include chemical residues, industrial solvents, and heavy metals. Proper handling, storage, treatment, and disposal are essential to prevent contamination and ensure regulatory compliance.

✿ Non-Hazardous Waste

Non-hazardous waste consists of materials that do not pose immediate health or environmental risks. Common examples include office paper, packaging materials, food waste, and inert by-products from manufacturing. Although less dangerous, effective segregation and disposal are crucial to prevent environmental burden and to promote recycling and sustainable waste practices.

✿ VOC (Volatile Organic Compounds)

VOCs are organic chemicals that easily vaporize at room temperature, often released during industrial processes involving paints, solvents, and fuels.

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They contribute to air pollution and smog formation, impacting human health and the environment. Monitoring and controlling VOC emissions are essential for regulatory compliance and environmental protection.

✿ BAT (Best Available Techniques)

BAT refers to the most effective and advanced methods, equipment, or processes available to minimize environmental impact. These techniques reflect proven and practical solutions for controlling emissions and waste, considering cost-efficiency and technical viability. Implementing BAT ensures high environmental performance in line with legal and sustainability standards.

✿ REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals)

REACH is a comprehensive European Union regulation designed to improve the protection of human health and the environment from chemical risks. It requires companies to identify and manage chemical hazards, provide safety data, and obtain authorization for high-risk substances, ensuring safe use across supply chains and industries.

5. Roles and Responsibilities

✿ Senior Management

Senior Management is responsible for setting strategic goals related to waste management and sustainability. They allocate the necessary financial, human, and technical resources to support effective policy implementation. Their leadership ensures that waste reduction is integrated into business planning, performance evaluation, and the overall ESG vision of the organization.

✿ EHS Team

The Environment, Health & Safety (EHS) Team plays a key role in monitoring waste management practices, ensuring compliance with legal and internal standards, and reporting environmental performance. They conduct audits, maintain records, guide departments on safe disposal methods, and coordinate corrective actions in case of non-compliance or environmental incidents.

✿ Operations Department

The Operations Department is responsible for the practical execution of waste management procedures. This includes proper segregation of waste by type, overseeing treatment processes, facilitating recycling efforts, and ensuring safe and compliant disposal. The team works closely with EHS to align daily activities with sustainability goals and regulatory requirements.

✿ Procurement Team

The Procurement Team ensures that suppliers and service providers meet SSMI-AD's environmental standards, particularly regarding the handling, storage, and disposal of waste and chemicals. They assess vendor capabilities, include sustainability criteria in contracts, and promote partnerships with environmentally responsible organizations, supporting upstream compliance and risk reduction across the supply chain.

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All Employees

All employees are expected to follow standard operating procedures (SOPs) for waste segregation, handling, and disposal. They must report any environmental incidents or unsafe practices and actively participate in training and awareness programs. Individual accountability and informed action are essential for effective and responsible waste management at every level of the organization.

6. Efficient Waste Management Policy

6.1 Employee Awareness

Employee awareness is a critical factor in the successful implementation of SSMI-AD's waste management and environmental policies. Without adequate understanding, even the most advanced systems may fail due to improper usage or non-compliance. SSMI-AD addresses this by providing comprehensive training programs, awareness workshops, and visual communication tools across all departments. Topics include waste segregation, environmental hazards, spill response, and the importance of regulatory compliance. Employees are encouraged to actively participate, ask questions, and provide feedback to improve the training process. Through continuous learning and engagement, SSMI-AD fosters a culture of environmental responsibility and shared accountability among its workforce.

6.2 Faulty Waste Handling

Improper sorting of waste can lead to inefficiencies, contamination, and regulatory non-compliance. SSMI-AD will establish a well-defined system for internal waste segregation by stream—such as wood, e-waste, wires, scrap metals, plastics, glass, and general waste. Clearly labeled bins and signage will be deployed throughout facilities to facilitate accurate sorting. Staff will be trained to differentiate waste types and dispose of them accordingly. This structured approach ensures that materials are routed to appropriate recycling or disposal channels. Proper segregation improves resource recovery rates, simplifies waste processing, and enhances the company's environmental compliance and sustainability performance.

6.3 Scrap Collection & Recycling

At SSMI-AD, metal scrap generated during manufacturing is seen as a valuable resource, not waste. The company advocates for a closed-loop production system in which all reusable scrap is efficiently collected, sorted, and reintegrated into the production process. Efficient scrap management reduces the dependency on virgin raw materials, minimizes waste sent to landfills, and supports circular economy goals. SSMI-AD implements dedicated scrap collection systems, conducts staff training on scrap segregation, and tracks material flow to identify reuse opportunities. This approach reduces environmental impact, optimizes resource use, and contributes to sustainable manufacturing practices within the non-ferrous alloy industry.

6.4 Repurposing Process Weakness

SSMI-AD is dedicated to minimizing internal waste by advancing reuse, recovery, and repurposing strategies. This includes reintroducing used items—such as machinery parts, office furniture, containers, and equipment—back into operations after necessary repairs or refurbishments. The aim is to extend the life cycle of materials and reduce the need for new resources.

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Departments will be encouraged to evaluate the reuse potential of discarded items before considering disposal. This initiative not only reduces waste volume and procurement costs but also supports circular economy practices. By fostering a reuse-first mindset, SSMI-AD promotes long-term sustainability and efficient resource utilization across all units.

6.5 Emissions from VOCs, SOx, NOx, and Dioxins

SSMI-AD recognizes the harmful environmental and health impacts of gaseous emissions such as VOCs, sulfur oxides (SOx), nitrogen oxides (NOx), and dioxins. To address this, the company is committed to minimizing air emissions through advanced pollution control technologies. These include sealed furnaces, wet scrubbers, filters, and gas washing systems installed at emission points. SSMI-AD also undertakes regular air quality monitoring to assess performance and ensure compliance with national and international emission standards. Continuous investment in emission reduction technologies and adherence to best practices ensure the protection of surrounding communities and ecosystems from industrial air pollution.

6.6 Waste Mapping Deficiency

To improve oversight and efficiency in waste management, SSMI-AD will implement a comprehensive waste stream mapping framework. This system will visualize the movement of waste from generation points through handling, storage, and final treatment or recycling. Mapping enables the identification of process inefficiencies, waste leaks, or cross-contamination risks. It also helps assess material loss points and evaluate opportunities for recovery or reduction. This proactive strategy will support targeted interventions, streamline operations, and enhance transparency in waste management. Waste stream mapping will be regularly updated and analyzed, driving continuous improvement and aligning operational practices with ESG and circular economy principles.

6.7 International Regulations

SSMI-AD proactively ensures its environmental practices are aligned with international environmental regulations and standards. This includes adherence to frameworks such as REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals), ISO 14001 (Environmental Management Systems), and Aluminium Stewardship Initiative (ASI) principles. Regulatory compliance is not viewed merely as a legal obligation but as a strategic priority. The company conducts regular environmental audits, engages with third-party evaluators, and updates internal practices based on global best practices. SSMI-AD's commitment to international compliance enhances its reputation, ensures sustainable operations, and positions the organization as a responsible leader in the global supply chain.

6.8 Sustainability Oversight Indicators

SSMI-AD has identified key sustainability risks related to waste and emissions, including improper hazardous waste disposal, harmful air emissions, chemical runoff in wastewater, inefficient scrap recycling, non-compliance with international environmental regulations, and inadequate employee awareness. Each risk is addressed through a clear policy statement and measurable KPIs. These policies ensure safe waste handling, pollution control, regulatory compliance, and promote a circular economy. KPIs like emissions levels, treatment percentages, audit scores, and employee training metrics are used to track progress. These indicators help SSMI-AD uphold its ESG commitments and continuously improve its environmental performance across all operational areas.

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6.9 Training Penetration

Employee involvement is central to effective waste management at SSMI-AD. To address the risk of knowledge gaps, the company will conduct regular, role-specific training programs focused on waste reduction, sorting methods, and environmentally sound disposal practices. These sessions will be tailored to the unique needs of various departments and roles, ensuring relevance and engagement. Visual aids, hands-on demonstrations, and case studies will be used to reinforce concepts. The objective is to build a culture where every employee understands the environmental impact of their actions and actively participates in sustainability efforts. Continuous education fosters accountability and strengthens organizational environmental performance.


6.10 Effluent Quality Breach

SSMI-AD is fully committed to preventing contamination of water bodies resulting from untreated or inadequately treated wastewater. All industrial wastewater generated from manufacturing and processing activities will undergo treatment processes to remove harmful chemicals before being discharged. The company maintains on-site wastewater treatment facilities and conducts routine testing to ensure compliance with local discharge norms and environmental quality benchmarks. In cases where chemical runoff poses a risk, additional neutralization and containment procedures are implemented. Through diligent wastewater management, SSMI-AD safeguards aquatic ecosystems, protects community water resources, and upholds its environmental and legal responsibilities.

7. ESG Objectives

- Sustainability Issue** : **Employee Awareness**
Objective : Improve employee knowledge on waste management
Measure : % of employees trained
Target Value : ↑ 100%
- Sustainability Issue** : **Faulty Waste Handling**
Objective : Strengthen correct segregation and disposal practices
Measure : % of compliant waste handling inspections
Target Value : ↑ 65%
- Sustainability Issue** : **Scrap Collection & Recycling**
Objective : Maximize internal scrap recovery and reuse
Measure : % of scrap recycled
Target Value : ↑ 60%
- Sustainability Issue** : **Repurposing Process Weakness**
Objective : Enhance reuse of non-hazardous process waste
Measure : % of waste repurposed
Target Value : ↑ 80%

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| 5. Sustainability Issue
Objective
Measure
Target Value | : Emissions from VOCs, SO_x, NO_x, and Dioxins
: Minimize emissions from operational sources
: mg/Nm ³ emissions
: ↓ 20% |
| 6. Sustainability Issue
Objective
Measure
Target Value | : Waste Mapping Deficiency
: Complete mapping of all waste streams
: % of streams mapped
: ↑ 15% |
| 7. Sustainability Issue
Objective
Measure
Target Value | : International Regulations
: Maintain alignment with global waste compliance standards
: % compliance rate
: ↑ 100% |
| 8. Sustainability Issue
Objective
Measure
Target Value | : Sustainability Oversight Indicators
: Develop measurable indicators for waste management
: No. of ESG KPIs implemented
: ↑ 6 |
| 9. Sustainability Issue
Objective
Measure
Target Value | : Training Penetration
: Expand waste-related ESG training coverage
: % of trained employees
: ↑ 100% |
| 10. Sustainability Issue
Objective
Measure
Target Value | : Effluent Quality Breach
: Ensure effluent meets discharge norms
: % samples within limits
: ↑ 80% |

8. Applicable Standards, Laws, Acts

- ISO 14001:2015 – Environmental Management Systems
- REACH (EU)
- Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 – India
- Factories Act, 1948 – India
- Carbon Disclosure Project (CDP)
- Aluminum Stewardship Initiative (ASI)

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- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- Global Reporting Initiative (GRI) Standards

9. Distribution and Annual Review

SSMI-AD's ESG Waste Management Policy will be actively disseminated to ensure awareness and compliance among all stakeholders. It will be displayed at operational sites and offices, integrated into employee onboarding and training, and shared during supplier meetings and ESG briefings. Suppliers and contractors will receive it through contractual agreements to ensure alignment with SSMI-AD's environmental standards. The ESG Committee will review the policy annually, incorporating regulatory updates, operational changes, and sustainability risks. Urgent interim reviews will occur if needed. This approach ensures continuous improvement, shared responsibility, and the highest environmental standards across SSMI-AD's operations and supply chain.

10. Disciplinary Action for Violators

SSMI-AD maintains a zero-tolerance approach to violations of its ESG Waste Management Policy. Any employee, contractor, or supplier found breaching the policy will be subject to appropriate disciplinary measures. These may include mandatory retraining, verbal or written warnings, temporary suspension, or, in cases of repeated or serious violations, termination of employment or contractual agreements. If the violation constitutes a breach of legal or regulatory requirements, the matter may be reported to relevant authorities for further action. This structured disciplinary framework ensures compliance, reinforces the importance of environmental responsibility, and promotes a culture of ethical and sustainable behavior throughout the organization.

11. Reporting Mechanism

SSMI-AD provides multiple, accessible channels for employees and stakeholders to report concerns or violations related to waste management. Reports can be submitted through the internal grievance portal, directly via email at nagaraj@sreesumangala.com, or anonymously through designated suggestion boxes located across operational sites. All reports are handled confidentially, with a strict no-retaliation policy in place to protect whistleblowers. The EHS or ESG Committee will investigate reported concerns promptly and thoroughly. This transparent reporting mechanism encourages open dialogue, fosters trust, and ensures that environmental risks, unsafe practices, or non-compliance issues are addressed swiftly and appropriately.

12. Conclusion

SSMI-AD's ESG Waste Management Policy represents a firm commitment to sustainable industrial practices, environmental responsibility, and regulatory compliance. By minimizing waste generation, promoting reuse and recycling, and ensuring safe handling of hazardous materials, we aim to significantly reduce our environmental footprint. This policy provides a structured framework to integrate ESG principles into daily operations and decision-making. Through collaboration with employees, suppliers, and other stakeholders, SSMI-AD strives to lead by example in promoting a circular economy and safeguarding the environment. Continuous improvement, proactive management, and accountability are at the heart of our journey toward operational excellence and long-term sustainability.

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2. Equitable Pay Commitment Policy

SSMI-AD/ESG/POLICY-02

1. Purpose

The purpose of this policy is to affirm SSMI-AD's unwavering commitment to pay a living wage to all employees and contract workers, safeguard human dignity, reduce poverty, and enhance economic security and equality. This policy forms a key component of our broader ESG strategy and human rights due diligence framework.

2. Scope of Application

This policy applies to all direct employees, temporary staff, and contract laborers engaged by or on behalf of SSMI-AD. It covers all business areas including manufacturing, operations, procurement, warehousing, distribution, and support services across all current operations in India and any international locations where SSMI-AD may expand.

3. Governance

The ESG Committee, in collaboration with the HR Department and Ethics & Compliance Unit, holds overall responsibility for the governance, implementation, and monitoring of the Living Wage Policy. This includes setting strategic direction, ensuring policy compliance, evaluating progress, addressing non-compliance, and integrating living wage principles into broader ESG and labor frameworks to uphold ethical employment standards across all operations.

4. Definition of Terms

✿ Living Wage

A Living Wage is the income necessary for a worker and their family to afford a basic but decent standard of living. It includes provisions for food, housing, healthcare, education, transport, and discretionary income, and is calculated based on local cost of living, inflation, and household size.

✿ Minimum Wage

The Minimum Wage is the lowest legally permissible remuneration that an employer must pay their workers. It is mandated by government regulations and may vary by region, industry, or skill level. Unlike the living wage, it may not always cover a worker's full cost of living or basic family needs.

✿ Wage Theft

Wage Theft refers to any unlawful or unethical withholding of wages or benefits from workers. This includes underpayment, unpaid overtime, misclassification, delayed payments, or illegal deductions. It violates labor laws and undermines workers' rights, often affecting vulnerable groups such as contract workers, temporary staff, and informal labor.

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External Stakeholder Human Rights

External Stakeholder Human Rights refer to the fundamental rights and freedoms of individuals or communities indirectly affected by a company's operations. This includes workers in the supply chain, contract labor, service providers, and local communities. Respecting these rights involves fair labor practices, environmental protection, and stakeholder engagement.

5. Roles and Responsibilities

Top Management

Top Management is responsible for providing strategic leadership and oversight to ensure the organization's commitment to fair wages. They approve budget allocations for wage adjustments, endorse policy revisions, and monitor implementation outcomes to align wage practices with ethical standards and global benchmarks.

HR Department

The HR Department conducts periodic living wage assessments, integrates findings into compensation structures, and ensures policy compliance. It plays a central role in implementing the Living Wage Policy, addressing wage-related grievances, facilitating employee communication, and fostering awareness through induction and training programs.

Procurement Team

The Procurement Team evaluates wage practices of suppliers and service providers during onboarding and audits. They ensure all third-party partners comply with SSMI-AD's Living Wage standards and include wage compliance clauses in contracts, thereby promoting responsible sourcing and ethical labor throughout the supply chain.

Finance Department

The Finance Department ensures accurate and timely wage disbursement in accordance with wage policies and legal requirements. They collaborate with HR to align wage structures with financial planning, track compliance with approved budgets, and maintain transparency in payroll systems, avoiding discrepancies or wage-related disputes.

All Employees

All employees are expected to comply with SSMI-AD's wage policies and uphold ethical standards related to compensation. They should promptly report any wage discrepancies, unfair practices, or violations through designated channels, thereby contributing to a transparent and fair workplace for all.

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6. Equitable Pay Commitment Policy

6.1 Wage Practices in Procurement

SSMI-AD expects all suppliers and vendors to uphold fair wage practices consistent with our ESG values. Procurement decisions take into account the social performance of suppliers, especially their commitment to paying living wages and complying with labor laws. Vendors failing to meet these standards may face corrective action, up to and including contract termination. We integrate ESG scoring into supplier evaluations and encourage suppliers to adopt SA8000 or equivalent standards. Fair wage practices in procurement are essential to maintaining responsible sourcing and supply chain transparency.

6.2 Alignment with International Frameworks

SSMI-AD ensures its wage and labor policies are aligned with globally recognized frameworks, including the UN Global Compact (UNGC), SA8000, Aluminium Stewardship Initiative (ASI), and OECD Guidelines for Multinational Enterprises. We conduct regular internal reviews and third-party assessments to ensure compliance and continuous improvement. These alignments strengthen our ESG performance, reinforce stakeholder trust, and position us as a responsible employer and supply chain partner. We consider global best practices not as benchmarks to meet, but as baselines to exceed.

6.3 Wage Payments

At SSMI-AD, we guarantee that all wages are paid on or before the legally stipulated payday without delays. In case of exceptional circumstances that hinder timely disbursement, employees are promptly informed in writing, and corrective actions are taken immediately. Delayed payments are investigated and must be justified. We also ensure interest compensation is provided if due. Our finance and HR departments collaborate to monitor payroll disbursements and ensure financial discipline. Timely wage payment is essential to employee welfare and a reflection of our organizational accountability.

6.4 Worker Consultation

We believe employees must have a voice in shaping the workplace policies that affect them, including those related to wages and working conditions. SSMI-AD conducts regular employee engagement sessions, wage satisfaction surveys, and open forums to gather feedback. This input is reviewed during policy formulation and wage reviews. Workers can participate anonymously or directly, and their concerns are taken seriously. We value inclusiveness and view ongoing dialogue as a foundation of mutual respect and informed decision-making within the organization.

6.5 Grievance Redressal

SSMI-AD provides all employees with access to a confidential, accessible, and fair grievance redressal system. Workers can report wage issues, harassment, or policy violations without fear of retaliation. Our multi-tier grievance process ensures that every concern is logged, investigated, and resolved within a defined timeframe. Employees are educated about the process during onboarding and via internal communications. We view an effective grievance system as central to a just workplace and a necessary mechanism for maintaining trust, fairness, and transparency.

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6.6 Harassment or Abuse of Workers

We are committed to providing a safe, respectful, and inclusive workplace, free from harassment or abuse of any kind. This includes verbal, physical, sexual, and psychological abuse. SSMI-AD's code of conduct strictly prohibits such behavior, and any reported incidents are promptly and confidentially investigated. Training is provided to employees and management on identifying and preventing workplace harassment. Our Internal Complaints Committee (ICC) operates under the POSH Act to safeguard the rights of all employees. Victims are protected against retaliation, and violators face strict disciplinary action, including termination or legal recourse.

6.7 Discrimination in Wages

We are committed to achieving pay equity across all dimensions, including gender, caste, ethnicity, religion, and other identities. At SSMI-AD, "equal pay for equal work" is not just a statement but a principle we actively enforce. We conduct periodic salary benchmarking and job evaluations to detect and correct wage disparities. Employees are encouraged to raise concerns about unfair compensation through designated grievance channels. Managers are trained to ensure unbiased performance evaluations and promotions, and HR reviews all salary decisions to prevent systemic or unconscious bias in compensation practices.

6.8 Exploitation of Contract Labor

SSMI-AD recognizes contract labor as a vital part of our workforce and is dedicated to ensuring their rights are equally protected. All contract workers must be hired under clear, fair, and legally binding agreements. We expect vendors and staffing partners to offer workers fair wages, health benefits, safe working conditions, and statutory entitlements. Our procurement team actively screens and monitors suppliers to ensure compliance with wage laws and labor standards. We encourage continuous engagement with contract workers to identify potential issues early and promote a dignified, non-exploitative work environment for all temporary and outsourced personnel.

6.9 Child Labor

SSMI-AD enforces a strict zero-tolerance policy toward child labor, in line with the Indian Child Labour (Prohibition and Regulation) Act and ILO conventions. No individual under the legal minimum working age shall be employed, whether directly or indirectly. We conduct thorough background verification and age documentation checks before employment. Our suppliers and vendors are required to implement the same standards and are subject to audits and penalties in case of violations. Education and awareness programs are also run in vulnerable communities to prevent the recruitment of underage labor into our value chain.

6.10 Fair Wage Deductions

SSMI-AD permits only lawful, pre-approved, and clearly communicated wage deductions. We prohibit any punitive or unauthorized deductions that reduce the employee's take-home pay below the living wage threshold. All deductions must be itemized on payslips, and consent must be obtained when legally required. Our payroll system is regularly reviewed to detect inconsistencies, and grievance redressal mechanisms are in place to address employee concerns related to deductions. We educate employees on their rights and obligations concerning wage deductions to promote transparency and financial fairness across all departments.

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6.11 Accessible Wage Information

We are committed to ensuring that every employee has full access to clear, transparent, and understandable wage information. Payslips are provided monthly in both written and digital formats, with multilingual support where necessary. These documents detail gross wages, deductions, taxes, benefits, and net take-home pay. We also train employees on how to interpret their payslips and understand statutory entitlements. Any ambiguity or discrepancy can be clarified through the HR helpdesk or designated grievance redressal channels. Accessible wage information promotes trust, financial literacy, and compliance within our workforce.

6.12 Cost-of-Living Adjustments

SSMI-AD reviews and adjusts employee wages annually to align with inflation, regional living costs, and market benchmarks. This ensures that wages remain sufficient to meet basic living needs over time. Adjustments are informed by third-party wage index studies and internal salary data. Special attention is given to lower-wage earners to avoid economic vulnerability. This proactive approach not only fosters financial stability for our workforce but also reflects our long-term commitment to equitable growth and employee well-being.

6.13 Declared Work

SSMI-AD opposes informal or undeclared work in all forms. Every employee must have a written employment contract and be registered for all applicable labor rights, including social security, insurance, and statutory benefits. We ensure complete transparency in employee documentation, payroll, and tax contributions. Audits are conducted regularly to identify and eliminate any hidden or under-the-table employment practices. All subcontractors and service providers are required to show proof of legal employment arrangements for their workers, as a condition for doing business with SSMI-AD. Our aim is to uphold lawful and accountable workforce practices at every level.


6.14 Compensation / Wage Theft

SSMI-AD is committed to ensuring all employees receive fair and timely compensation that meets or exceeds the living wage standard. We prohibit any form of wage theft, including unlawful deductions, payment delays, or misclassification of employment. Transparency in wage structures is central to our policy, and we strive for clarity in earnings and deductions communicated to employees. Our payroll system is designed to eliminate errors and promote fairness across all levels of the workforce. Managers are trained to uphold this commitment and ensure all compensation practices are lawful, equitable, and transparent.

6.15 Forced Labor in Supply Chain

SSMI-AD strictly prohibits any form of forced, bonded, trafficked, or involuntary labor within our operations and extended supply chain. We maintain a zero-tolerance policy and require all vendors to adopt transparent recruitment practices, provide written employment contracts, and permit workers to leave employment voluntarily. Our due diligence process includes supplier risk mapping, human rights self-assessments, and periodic audits aligned with SA8000 and global best practices. Employee awareness training ensures all staff can recognize and report any signs of forced labor, contributing to a culture of vigilance and ethical labor sourcing.

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7. ESG Objectives

1. Sustainability Issue

: Wage Practices in Procurement

Objective

: Enforce fair wage clauses in procurement contracts

Measure

: % of contracts with fair wage clauses

Target Value

: ↑ 70%

2. Sustainability Issue

: Alignment with International Frameworks

Objective

: Align wage policies with ILO and UNGC standards

Measure

: % policy alignment achieved

Target Value

: ↑ 80%

3. Sustainability Issue

: Wage Payments

Objective

: Ensure timely payment of wages

Measure

: % of wages paid on time

Target Value

: ↑ 100%

4. Sustainability Issue

: Worker Consultation

Objective

: Promote worker participation in wage decisions

Measure

: % departments with active wage consultation groups

Target Value

: ↑ 65%

5. Sustainability Issue

: Grievance Redressal

Objective

: Establish a functioning wage grievance mechanism

Measure

: % grievance cases resolved

Target Value

: ↑ 70%

6. Sustainability Issue

: Harassment or Abuse of Workers

Objective

: Eliminate workplace abuse and promote dignity

Measure

: % of harassment-free audits

Target Value

: ↑ 85%

7. Sustainability Issue

: Discrimination in Wages

Objective

: Ensure equal pay for equal work


Measure

: % pay parity by gender

Target Value

: ↑ 60%

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|---|---|
| 8. Sustainability Issue
Objective
Measure
Target Value | : Exploitation of Contract Labor
: Guarantee fair wages for contract workers
: % contract workers paid living wage
: ↑ 80% |
| 9. Sustainability Issue
Objective
Measure
Target Value | : Child Labor
: Eliminate child labor in operations and supply chain
: % child labor cases detected
: ↓ 60% |
| 10.Sustainability Issue
Objective
Measure
Target Value | : Wage Deductions
: Prevent unauthorized deductions from wages
: % compliance in wage audit
: ↑ 75% |
| 11.Sustainability Issue
Objective
Measure
Target Value | : Accessible Wage Information
: Improve transparency of wage structures
: % employees with access to wage details
: ↑ 60% |
| 12.Sustainability Issue
Objective
Measure
Target Value | : Cost-of-Living Adjustments
: Introduce annual cost-of-living wage review
: % employees receiving adjusted wages
: ↑ 100% |
| 13.Sustainability Issue
Objective
Measure
Target Value | : Declared Work
: Eliminate informal and undeclared employment
: % workforce officially registered
: ↑ 100% |
| 14.Sustainability Issue
Objective
Measure
Target Value | : Compensation / Wage Theft
: Ensure accurate and complete wage payments
: % payroll accuracy
: ↑ 100% |
| 15.Sustainability Issue
Objective
Measure
Target Value | : Forced Labor in Supply Chain
: Identify and eliminate forced labor risks
: % suppliers screened for forced labor
: ↑ 100% |

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8. Applicable Standards, Laws, and Acts

- Indian Minimum Wages Act,
- 1948; Payment of Wages Act, 1936;
- Code on Wages, 2019.
- SA8000 Standard
- UN Global Compact (Principle 1–6)
- OECD Guidelines for Multinational Enterprises
- GRI Standards (GRI 202, 401)
- Aluminum Stewardship Initiative (ASI) Performance Standard
- ILO Conventions No. 26, 95, 131

9. Distribution and Annual Review

SSMI-AD's Living Wage Policy is communicated across all organizational levels through onboarding sessions, regular training programs, and multi-language availability to ensure accessibility. The policy is displayed on workplace notice boards and published on the intranet, ensuring all employees, regardless of role or location, are informed of their rights and the company's commitment to ethical compensation. It is reviewed annually—or sooner if needed—considering legal updates, industry benchmarks, cost-of-living changes, audit findings, and stakeholder feedback. Any revisions are communicated to all stakeholders, ensuring transparency, compliance with labor laws, and continued alignment with global fair wage standards.

10. Disciplinary Action for Violators

Violations of this policy—such as wage theft, unfair pay practices, deliberate misclassification of workers, or obstruction of audits—will result in strict disciplinary measures. Employees or management found culpable may face actions including formal warnings, suspension, termination, or referral for legal prosecution. Similarly, suppliers or contractors violating wage provisions may be delisted or have their contracts terminated. SSMI-AD enforces a zero-tolerance approach to wage-related malpractice. This reflects the company's commitment to ethical labor standards, respect for worker rights, and responsible business conduct throughout its operations and supply chain.

11. Reporting Mechanism

SSMI-AD ensures the presence of robust and confidential channels for employees and stakeholders to report wage-related concerns. An anonymous reporting system is in place to encourage transparency without fear of retaliation. Regular wage audits, coupled with employee feedback surveys, help identify gaps and areas for improvement. Reported grievances are logged, assessed, and addressed by the HR and Compliance Committee within 14 working days. If required, corrective and preventive actions are implemented promptly. This mechanism upholds the principles of fairness, accountability, and responsive grievance redressal in wage-related matters.

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12. Conclusion

At SSMI-AD, we consider the provision of a living wage to be an essential aspect of ethical employment and human rights. This policy underscores our unwavering commitment to providing fair remuneration that meets the basic needs of workers and their families, while enabling a life of dignity and opportunity. By aligning with ESG principles, we aim to create a just and inclusive work environment and promote sustainable practices across our value chain. The Living Wage Policy is a testament to our belief in equitable growth, social responsibility, and the continuous betterment of working conditions.

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3. Ethical Conflict Management Policy

SSMI-AD/ESG/POLICY-03

1. Purpose

To prevent and manage situations where personal interests could improperly influence professional judgment or lead to corruption, SSMI-AD is committed to preserving stakeholder trust, promoting ethical decision-making, and ensuring legal compliance. This approach strengthens organizational integrity, reduces reputational risks, and aligns with our ESG principles by fostering transparency, accountability, and fairness in all business operations.

2. Scope of Application

This policy applies to all SSMI-AD employees (permanent and temporary), contractors, agents, suppliers, consultants, and board members. It covers functions including procurement, sales, HR, finance, operations, logistics, R&D, and ESG governance. The geographical scope includes all SSMI-AD operations in India and any associated overseas business activities.

3. Governance

Oversight of the policy lies with the ESG & Ethics Committee, supported by the Chief Compliance Officer (CCO) and Human Resources. This team is responsible for managing conflict of interest disclosures, conducting investigations, authorizing decisions, and ensuring timely and accurate reporting to the Board. They also oversee compliance and recommend policy improvements as needed.

4. Definition of Terms

✿ Conflict of Interest

A situation where an individual's personal or private interests may interfere with their professional responsibilities, potentially leading to biased or unethical decisions. This includes any condition where personal gain could influence actions or judgments made on behalf of the company, intentionally or unintentionally, compromising objectivity and integrity.

✿ Corruption

Corruption involves the misuse of entrusted authority for personal or private gain. It encompasses practices such as bribery, facilitation payments, embezzlement, and kickbacks. These unethical acts undermine fairness, erode public and stakeholder trust, and violate laws and internal policies, posing serious legal and reputational risks to the organization.

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Personal Interest

Personal interest refers to any benefit—financial or otherwise—that an individual, their family, friends, or affiliated organizations might receive. This includes ownership, investments, close personal relationships, or other connections that could influence decisions made in a professional role, potentially creating conflicts and impairing impartiality and accountability.

5. Roles and Responsibilities

Employees

All employees are responsible for promptly disclosing any actual, potential, or perceived conflicts of interest in writing to their manager or the Compliance Officer. They must avoid actions that could compromise their impartiality or decision-making and seek guidance when in doubt to ensure transparency and integrity in all operations.

Managers

Managers must remain vigilant in identifying potential conflicts within their teams. They are responsible for fostering open communication, encouraging prompt disclosures, and supporting employees through the reporting process. Managers should escalate any concerns to the Compliance Officer and ensure team members receive adequate guidance and training on managing conflicts ethically.

Chief Compliance Officer (CCO)

The CCO is responsible for maintaining a central conflict of interest registry, assessing reported disclosures, and ensuring timely resolution in accordance with company policy. The CCO also conducts regular training and awareness programs, provides advisory support, and ensures alignment with internal policies and external legal or regulatory requirements.

HR Committee / Board

The HR Committee or Board reviews high-risk or senior-level conflict of interest cases. They assess potential risks, oversee impartial resolution, and implement corrective or disciplinary actions if necessary. Their oversight ensures consistency, fairness, and adherence to corporate governance standards and ethical expectations across all organizational levels.

6. Ethical Conflict Management Policy

6.1 Conflicts in Supplier Onboarding and Auditing

SSMI-AD requires employees engaged in supplier evaluation, onboarding, or auditing to declare any personal, professional, or financial connections with the suppliers under review. Such individuals must not participate in decision-making or audits related to these suppliers.

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Supplier assessments must be conducted by neutral, qualified teams or independent third parties. This policy safeguards the objectivity and reliability of supplier evaluations and ensures that procurement partnerships are selected based on merit, quality, compliance, and ethical alignment with SSMI-AD values.

6.2 Use of Insider Information

Access to confidential or strategic business information is a privilege that comes with legal and ethical responsibilities. Employees must not use insider information for personal gain or share it with others for unauthorized benefit. Misuse of such information—including financial, operational, or strategic data—is a serious breach of company policy and may lead to disciplinary and legal consequences. SSMI-AD enforces strict controls on sensitive information to prevent insider trading, unfair advantage, and breaches of stakeholder trust.

6.3 Financial Reporting

Employees involved in financial planning, accounting, or reporting must ensure that records are complete, accurate, and compliant with applicable laws and standards. Any personal financial incentives tied to reported figures must be declared to prevent manipulation or misrepresentation. SSMI-AD mandates periodic internal and external audits to verify accuracy and integrity. Deliberate misreporting or concealment of financial data is considered a serious offense and undermines stakeholder confidence. This policy promotes responsible reporting and sound financial governance.

6.4 Conflict in ESG Reporting

ESG-related data—including environmental metrics, social indicators, and governance scores—must be collected, verified, and reported by independent personnel or third parties without personal incentives influencing the process. Any employee benefiting from ESG performance-linked bonuses or recognition must disclose such interests. ESG reports are subject to external review to ensure alignment with regulatory expectations and stakeholder trust. SSMI-AD's approach to ESG reporting emphasizes transparency, objectivity, and accountability, reinforcing our commitment to sustainability and ethical disclosure practices.

6.5 Conflict in Environmental Clearances

Environmental assessments must be conducted independently and without influence from employees with personal or financial stakes in the consulting firms involved. SSMI-AD strictly prohibits employees from accepting compensation, gifts, or favors in exchange for influencing the outcome of environmental reviews or regulatory clearances. Any such relationship must be declared, and the concerned individual must recuse themselves from the process. This policy ensures objectivity and compliance with environmental laws while upholding the company's commitment to sustainability and transparency.

6.6 Financial Conflicts in Financial Approvals

Employees involved in financial decision-making, such as approvals of large expenditures, investments, or budget allocations, must disclose any direct or indirect financial interest in the transaction. To avoid conflicts of interest, such approvals require an independent counter-signature and are subject to periodic audits. This process fosters a culture of accountability and ensures that financial decisions are free from personal bias. SSMI-AD's finance policy supports transparency and integrity in budgeting, purchasing, and project finance management across departments.

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6.7 Insider Influence in Sales & Contracts

Employees involved in sales and contract negotiations must act in the best interest of SSMI-AD and not allow personal ties or interests to influence business decisions. Any familial, financial, or personal relationships with existing or potential customers, dealers, or agents must be disclosed to management. Contracts suspected to be influenced by internal relationships are subject to review by the Ethics Committee to maintain fairness and transparency. This policy safeguards SSMI-AD from reputational and financial risks while ensuring that all commercial engagements reflect professional integrity and compliance with corporate governance standards.

6.8 Use of Corporate Assets for Personal Gain

Corporate assets—including financial resources, facilities, vehicles, equipment, and intellectual property—are to be used strictly for business purposes. SSMI-AD does not tolerate unauthorized personal use of these resources. Employees found to have misused company assets must report the incident, cooperate in internal inquiries, and may be subject to financial restitution and disciplinary action. All asset usage must be recorded, monitored, and periodically reviewed by the administration and finance departments. This policy ensures optimal utilization of resources and upholds accountability in maintaining organizational property.

6.9 Kickbacks via Agents or Brokers

SSMI-AD enforces a strict ban on kickbacks and under-the-table arrangements in any transaction involving third-party agents, brokers, or intermediaries. Employees must ensure that all third-party payments—whether commission, bonus, or referral—are documented, justified, and approved in accordance with company policy. Suspected kickbacks are subject to internal investigation and, where necessary, external reporting. SSMI-AD is committed to ethical third-party relationships that reflect trust, legality, and adherence to anti-bribery frameworks, helping to maintain integrity across business development and procurement processes.

6.10 Conflict in Community Engagement Projects

SSMI-AD ensures that community development and CSR initiatives are executed impartially and free from conflicts of interest. Employees or representatives leading these projects must not have any personal or financial interest in the communities or entities being supported. Any such ties must be disclosed in advance and handled transparently. Project allocations, partnerships, and disbursement decisions should be overseen by the CSR committee. This policy guarantees that social investment decisions are fair, inclusive, and aligned with genuine community needs, preserving public trust and organizational credibility.

6.11 Vendor Favoritism in Procurement

SSMI-AD mandates that procurement decisions are made independently and based solely on merit, such as price, quality, delivery, and compliance. Personal relationships or affiliations with vendors, suppliers, or bidders must be disclosed immediately to prevent favoritism or undue influence. Any individual with such connections must recuse themselves from related decisions.

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Procurement records must be transparent and auditable. SSMI-AD promotes fair competition among vendors and requires all procurement team members to undergo regular training on ethical sourcing and anti-corruption measures. This policy strengthens accountability in our supply chain and ensures integrity in vendor engagement.

6.12 Bribery to Secure Permits or Clearances

SSMI-AD prohibits all forms of bribery and facilitation payments in its interactions with regulatory bodies and public officials. Employees must never offer, accept, or condone unofficial payments or incentives to expedite licenses, permits, inspections, or clearances. Any solicitation for a bribe must be immediately reported through internal compliance channels. Interactions with government representatives must be documented and, when necessary, conducted with oversight. This zero-tolerance approach to bribery reflects SSMI-AD's adherence to anti-corruption laws and ethical governance, reinforcing our commitment to operating with transparency and integrity across all jurisdictions.

6.13 Hiring Bias through Nepotism

SSMI-AD maintains a strict policy against nepotism to ensure that recruitment processes remain fair, transparent, and merit-based. The hiring of individuals based on familial, personal, or social connections is not allowed unless fully disclosed and reviewed. All recruitment decisions must follow a documented process with oversight from Human Resources and the Ethics Committee. Hiring managers are required to proactively declare any potential conflicts of interest before initiating the recruitment process. SSMI-AD promotes equal opportunity employment to build a workforce based solely on qualifications, competencies, and organizational needs, reinforcing our commitment to ethics and inclusivity.

6.14 Conflicts in Joint Ventures and Partnerships

All financial or personal interests in joint ventures, partnerships, or strategic alliances must be disclosed prior to the formation of any agreement. Employees involved in vetting or negotiating such ventures must remain impartial and follow an approval process that includes oversight by senior leadership or the Ethics Committee. This ensures that partnerships are established on sound legal, ethical, and commercial grounds, avoiding risks of self-dealing, favoritism, or unethical conduct. SSMI-AD encourages responsible collaboration with partners who align with its values.


6.15 Cross-holdings in Supplier or Customer Firms

SSMI-AD employees holding financial stakes, shares, or board memberships in supplier or customer companies must disclose such interests to the Ethics Committee and recuse themselves from related decision-making. These disclosures help mitigate risks of biased judgments, favoritism, or reputational damage. Transparency in such relationships is crucial to maintaining ethical commercial engagements. This policy fosters a culture of accountability and prevents undue influence in corporate transactions.

7. ESG Objectives


1. Sustainability Issue	: Conflicts in Supplier Onboarding and Auditing
Objective	: Ensure impartiality in supplier evaluation
Measure	: % of onboarding processes audited for COI
Target Value	: ↑ 80%

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|---|--|
| 2. Sustainability Issue
Objective
Measure
Target Value | : Use of Insider Information
: Prevent insider information abuse
: % of employees trained on information ethics
: ↑ 65% |
| 3. Sustainability Issue
Objective
Measure
Target Value | : Financial Reporting
: Ensure transparency in financial disclosures
: % of financial reports independently reviewed
: ↑ 55% |
| 4. Sustainability Issue
Objective
Measure
Target Value | : Conflict in ESG Reporting
: Maintain objectivity in ESG disclosures
: % ESG data verified by third-party
: ↑ 65% |
| 5. Sustainability Issue
Objective
Measure
Target Value | : Conflict in Environmental Clearances
: Eliminate conflict-driven approvals
: % of environmental clearances independently verified
: ↑ 70% |
| 6. Sustainability Issue
Objective
Measure
Target Value | : Financial Conflicts in Financial Approvals
: Implement dual-level checks on financial approvals
: % of financial approvals reviewed
: ↑ 80% |
| 7. Sustainability Issue
Objective
Measure
Target Value | : Insider Influence in Sales & Contracts
: Prevent undue influence in commercial decisions
: % of sales/contracts reviewed for COI
: ↑ 65% |
| 8. Sustainability Issue
Objective
Measure
Target Value | : Use of Corporate Assets for Personal Gain
: Strengthen controls on asset utilization
: % of asset usage audits completed
: ↑ 100% |
| 9. Sustainability Issue
Objective
Measure
Target Value | : Kickbacks via Agents or Brokers
: Prevent unethical commissions or payments
: % of intermediaries vetted for integrity
: ↑ 80% |

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10.Sustainability Issue : Conflict in Community Engagement Projects

Objective : Promote fairness in project selection
Measure : % of community projects vetted for COI
Target Value : ↑ 90%

11.Sustainability Issue : Vendor Favoritism in Procurement

Objective : Ensure equal opportunity in vendor selection
Measure : % of procurements reviewed for fairness
Target Value : ↑ 65%

12.Sustainability Issue : Bribery to Secure Permits or Clearances

Objective : Eradicate bribery from approval processes
Measure : % employees in approvals trained on anti-bribery
Target Value : ↑ 60%

13.Sustainability Issue : Hiring Bias through Nepotism

Objective : Promote merit-based recruitment
Measure : % of recruitments audited for bias
Target Value : ↑ 75%

14.Sustainability Issue : Conflicts in Joint Ventures and Partnerships

Objective : Address COI in partnership agreements
Measure : % partnerships screened for COI
Target Value : ↑ 70%

15.Sustainability Issue : Cross-holdings in Supplier or Customer Firms

Objective : Disclose and regulate cross-ownership risks
Measure : % of disclosures filed on cross-holdings
Target Value : ↑ 60%

8. Applicable Standards, Laws, Acts

- FCPA, UK Bribery Act,
- UNGC Principle 10,
- OECD Guidelines Chapter IV,
- ISO 37001, GRI 205.
- ASI: Section on Ethics & Governance.
- Prevention of Corruption Act,
- Companies Act 2013, Indian Penal Code, 1860.

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9. Distribution and Annual Review

SSMI-AD communicates its Conflict of Interest and Anti-Corruption Policy through onboarding sessions, internal platforms like the intranet and notice boards, and external channels such as vendor portals and contract documents. The policy is reinforced via training modules, refresher courses, and awareness campaigns, with translations provided where necessary to ensure comprehension across all stakeholders. An annual review is conducted by the ESG & Ethics Committee and the Chief Compliance Officer, incorporating legal updates, audit findings, incident learnings, and global best practices. Approved changes are logged and communicated organization-wide, ensuring the policy remains transparent, effective, and aligned with SSMI-AD's ethical and ESG commitments.

10. Disciplinary Action for Violators

Violations of this policy—such as undisclosed conflicts of interest, engagement in bribery, facilitation payments, or other forms of corruption—are treated as serious misconduct. Disciplinary measures may include formal warnings, suspension, demotion, termination of employment, or legal prosecution, depending on the severity of the violation. For external parties such as vendors, breaches of this policy may lead to immediate contract termination and disqualification from future partnerships. SSMI-AD maintains a zero-tolerance stance and ensures fair and consistent application of disciplinary procedures to protect the company's ethical standards, reputation, and legal compliance.

11. Reporting Mechanism

SSMI-AD provides multiple secure and confidential channels for reporting suspected conflicts of interest or corruption. These include a dedicated email, a 24/7 hotline (internal and external), a mobile reporting app, and direct escalation to the Chief Compliance Officer. All reports are acknowledged within three business days and thoroughly investigated by the Compliance team in a fair, transparent, and timely manner. Whistleblowers are protected under strict non-retaliation guarantees. Confidentiality is rigorously maintained, and retaliation against reporters will result in disciplinary action. The process is designed to encourage reporting, protect all parties involved, and ensure swift resolution of issues.

12. Conclusion

At SSMI-AD, integrity is fundamental to our success and sustainability. This Conflict of Interest and Anti-Corruption Policy is a vital component of our ethical framework, ensuring transparency, fairness, and accountability in all business dealings. By fostering a culture of openness and ethical decision-making, we strengthen stakeholder trust and support long-term ESG objectives. Through consistent enforcement, education, and leadership oversight, we aim to eliminate unethical behavior and reinforce responsible practices across our operations. All employees, partners, and vendors are expected to uphold the principles outlined in this policy, contributing to a trustworthy and compliant business environment.

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4. Stakeholder Rights Protection Policy

SSMI-AD/ESG/POLICY-04

1. Purpose

This policy reaffirms SSMI-AD's commitment to respecting and safeguarding the human rights of all external stakeholders—suppliers, contractors, customers, and affected communities. It seeks to embed international human rights principles into all business operations, promoting ethical conduct, accountability, and social responsibility. Through this approach, SSMI-AD aims to build long-term trust and positive impact across its stakeholder network.

2. Scope of Application

This policy applies to all external stakeholders including suppliers, service providers, customers, transporters, contract workers, NGOs, communities, and local authorities. It covers business areas such as procurement, logistics, vendor management, customer engagement, and community relations across all current and future SSMI-AD operations in India and with international partners or suppliers.

3. Governance

The ESG Committee at SSMI-AD, led by a senior management representative, oversees the implementation of this policy. Reporting to the Board of Directors, the committee collaborates with Procurement, Compliance, and CSR departments to ensure effective monitoring and protection of stakeholder rights across all business operations and partnerships.

4. Definitions of Key Terms

✿ External Stakeholders

External stakeholders are individuals or groups who are not directly employed by SSMI-AD but are impacted by its operations. This includes suppliers, contractors, customers, local communities, NGOs, and authorities. Their rights and well-being are considered essential to the company's responsible business practices and long-term sustainability.

✿ Human Rights

Human rights are the basic freedoms and protections to which every person is entitled, regardless of nationality, gender, ethnicity, religion, or any other status. These include the right to life, dignity, safety, freedom of expression, and fair treatment. SSMI-AD upholds these rights in all business relationships and decisions.

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☀ Due Diligence

Due diligence refers to the ongoing process of identifying, preventing, mitigating, and accounting for potential or actual human rights violations within SSMI-AD's operations and supply chain. It involves regular assessments, stakeholder engagement, and taking corrective actions to ensure ethical, transparent, and responsible business conduct at all levels.

☀ Remediation

Remediation is the act of addressing and repairing harm caused by human rights violations. At SSMI-AD, this involves providing fair remedies, such as compensation, policy changes, or improved practices, and ensuring affected parties are heard and supported. It demonstrates the company's commitment to accountability and ethical responsibility.

5. Roles and Responsibilities

☀ Board of Directors

The Board of Directors holds ultimate oversight over SSMI-AD's human rights policy. It is responsible for reviewing and approving the policy, ensuring alignment with global standards and corporate values. The Board also monitors implementation progress and holds senior leadership accountable for upholding stakeholder rights and ethical business practices.

☀ ESG Committee

The ESG Committee leads the enforcement of the human rights policy, conducting regular risk assessments and ensuring stakeholder engagement across operations. It collaborates with internal departments and external partners to integrate human rights principles into day-to-day practices and reports progress and concerns to the Board of Directors as required.

☀ Procurement Team

The Procurement Team is responsible for assessing vendors and enforcing ethical sourcing standards. This includes evaluating supplier practices, incorporating human rights clauses in contracts, and conducting regular audits. The team ensures that suppliers uphold fair labor practices, environmental responsibility, and the protection of community rights throughout the supply chain.

☀ Legal & Compliance

The Legal and Compliance department ensures that all SSMI-AD operations and partnerships adhere to national and international human rights laws. It reviews contracts, monitors legal risks, provides guidance on regulatory changes, and supports investigations and corrective actions related to any human rights violations within the company's scope of influence.

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CSR & Community Teams

The CSR and Community Teams engage directly with local communities, NGOs, and other stakeholders to understand concerns, gather feedback, and resolve human rights issues. They implement social programs, promote inclusive development, and act as key contact points for external stakeholders impacted by SSMI-AD's operations, promoting transparency and trust.

6. Stakeholder Rights Protection Policy

6.1 Transporter Ethics Breach

SSMI-AD expects all logistics and transport providers to adhere to its human rights standards, including labor rights, fair wages, and safe working conditions. Transport contracts incorporate specific human rights clauses and are subject to regular audits and compliance reviews. Any violations—such as unsafe vehicle conditions, overworked drivers, or discriminatory practices—are promptly addressed. We engage closely with logistics partners to build awareness and ensure continuous improvement. Human rights diligence extends beyond production sites to every point in our value chain, including transportation. Upholding labor and ethical standards in logistics is key to maintaining responsible operations from source to delivery.

6.2 Participation to Marginalized Groups

SSMI-AD promotes inclusive community engagement that actively involves marginalized and underrepresented groups such as women, indigenous populations, and persons with disabilities. Engagement plans are designed to be accessible, multilingual, and culturally sensitive. We conduct targeted outreach sessions and ensure that these groups have the opportunity to voice concerns and influence decisions. Barriers to participation—whether logistical, cultural, or informational—are identified and removed. SSMI-AD evaluates participation metrics to assess representation and fairness. Inclusion is not merely symbolic; it is essential to building equitable partnerships with communities. By empowering diverse voices, we create more just and sustainable development outcomes.

6.3 Grievance Handling Deficiency

When human rights violations occur in our external operations or through our partners, SSMI-AD ensures that fair, timely, and effective remediation is provided. Victims are offered clear communication, restoration of rights, and, where appropriate, compensation or other forms of redress. Remediation is proportional to the harm and is guided by stakeholder input. All cases are documented, monitored, and evaluated for improvement opportunities. SSMI-AD works with third-party experts when needed to ensure impartiality and justice. We recognize that accountability does not end with acknowledgment—it requires corrective action. Our remediation practices are a cornerstone of our responsible business framework.

6.4 Whistleblower Actions

SSMI-AD enforces a strict zero-retaliation policy to protect individuals who report human rights concerns. Whistleblowers—whether employees, external partners, or community members—are guaranteed anonymity, confidentiality, and safety throughout the investigation process.

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Retaliatory actions such as threats, dismissal, or harassment are met with disciplinary action. Reporting mechanisms are continuously monitored to ensure accessibility and effectiveness. SSMI-AD conducts regular awareness campaigns to inform all stakeholders of their rights and protections. We believe transparency and accountability are only possible when people feel safe to speak up without fear. Protecting whistleblowers is foundational to our ethical commitment and due diligence framework.

6.5 Community Environmental Impact

SSMI-AD is committed to minimizing environmental harm in all its operations and those of its suppliers. We conduct environmental impact assessments and enforce standards to prevent pollution, resource depletion, and other harms to local ecosystems and communities. Contractors must adhere to waste disposal, emissions, and water use protocols. Community concerns about environmental impacts are addressed through transparent grievance mechanisms and corrective actions. Restoration initiatives are undertaken in partnership with local stakeholders. We view environmental responsibility not just as regulatory compliance, but as a moral duty to protect the natural resources and well-being of surrounding communities.

6.6 Exploitative Wages by Third Parties

SSMI-AD insists that all third-party employers pay their workers fair wages in accordance with legal standards. Contracts include wage compliance clauses, and periodic wage audits are conducted to detect underpayment or irregularities. In case of discrepancies, suppliers are required to provide back pay and take corrective measures. SSMI-AD also educates external partners on compensation best practices and regularly monitors compliance through feedback and grievance channels. By promoting wage fairness across the extended workforce, we help safeguard livelihoods and build ethical labor practices. Fair compensation is fundamental to human dignity and central to SSMI-AD's responsible business strategy.

6.7 Extended Work Periods

SSMI-AD expects all suppliers and contractors to comply with legal regulations regarding working hours, overtime, and mandatory rest periods. We actively monitor labor practices through audits and feedback mechanisms to ensure that external workers are not subjected to excessive workloads or unsafe schedules. Partners are required to maintain transparent attendance and wage records, and to provide weekly rest and paid leave as per local laws. Violations are addressed through progressive enforcement and remediation. SSMI-AD views humane working hours as integral to occupational health and productivity, and commits to preventing the exploitation of time and labor across its supply chain.

6.8 Violation of Cultural Rights

SSMI-AD respects the cultural heritage, traditions, and values of all communities impacted by its business. We ensure that no operations or projects encroach upon sacred sites, local customs, or community institutions without consultation and agreement. Cultural impact assessments are conducted before initiating any development activities. We collaborate with community leaders, anthropologists, and local authorities to prevent cultural insensitivity.

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SSMI-AD promotes respect and preservation of indigenous identities, and supports awareness programs to build cultural understanding within the company and its partners. Protecting cultural rights is essential for maintaining social harmony and community trust in all our regions of operation.

6.9 Discrimination by Contractors or Vendors

SSMI-AD requires all external business partners to uphold principles of equality and non-discrimination. Contracts explicitly prohibit differential treatment based on race, gender, caste, religion, disability, or other protected characteristics. We evaluate vendors on their inclusivity practices and provide guidance and training to foster equitable workplace environments. Complaints involving discriminatory behavior by contractors are promptly investigated and resolved. SSMI-AD encourages a culture of dignity and mutual respect across all touchpoints of its value chain. By promoting fairness and inclusion among suppliers and partners, we aim to extend our internal equity values to the wider community of external stakeholders.

6.10 Child Labor in the Extended Operations

SSMI-AD strictly prohibits child labor in any aspect of its operations or partnerships. All external contractors, vendors, and suppliers are required to implement age-verification mechanisms and adhere to applicable national and international child labor laws. SSMI-AD conducts routine assessments to verify compliance and provides training to vendors to build awareness around legal age requirements and ethical recruitment. In the event of a violation, immediate remedial measures are undertaken, including withdrawal of minors, rehabilitation support, and vendor re-evaluation. Our commitment is to ensure every child's right to education and protection, and to support supply chains that are child-labor free.

6.11 Working Conditions for External Workers

SSMI-AD mandates that all external parties—including suppliers and contractors—comply with our Environmental, Health, and Safety (EHS) guidelines to ensure safe and hazard-free work environments. Safety training, protective equipment, and emergency protocols must be provided to all external workers. Regular inspections and audits are conducted to evaluate EHS compliance at third-party sites. Violations are met with prompt enforcement actions and support for remediation. SSMI-AD emphasizes proactive engagement with partners to strengthen safety culture and reduce occupational hazards. We believe that every individual working within or through our operations deserves a secure and healthy workplace environment, regardless of employment status.

6.12 Forced Labor in the Supply Chain

SSMI-AD has a zero-tolerance policy toward forced, bonded, or involuntary labor. All suppliers and service providers are required to certify compliance with ethical labor practices. We conduct regular due diligence and independent audits to verify that no coercion, deception, or trafficking occurs in our extended operations. Supplier agreements include mandatory anti-forced labor clauses, and any non-compliance triggers immediate corrective actions. We work closely with vendors to build capacity for ethical employment and maintain transparent records. Our goal is to eliminate any form of exploitation across all tiers of our supply chain, reinforcing dignity and human rights for every worker.

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6.13 Land Rights Violations During Expansion

SSMI-AD upholds the land rights of local communities and ensures that all land acquisitions or leases are preceded by Free, Prior, and Informed Consent (FPIC). Before any expansion project, we conduct detailed impact assessments and consult with affected populations to ensure transparency and mutual agreement. Disputes are resolved through dialogue and mediation, with respect for customary and legal land rights. SSMI-AD is committed to avoiding forced evictions or encroachments, and we work closely with community leaders and authorities to preserve trust. Ethical land use is central to our sustainability practices and long-term community relationships.

6.14 Access to Grievance Mechanisms

SSMI-AD is committed to ensuring that all external stakeholders—such as suppliers, workers, customers, and communities—have easy access to grievance mechanisms. Channels are available in multiple formats, including digital platforms, helplines, and on-site drop boxes. We proactively communicate these options during onboarding and through community outreach programs. SSMI-AD guarantees timely, fair, and confidential handling of all complaints. Non-retaliation and follow-up monitoring are core elements of the grievance process. Stakeholders are encouraged to report concerns without fear, and we continuously assess accessibility and effectiveness. We believe that robust grievance systems are essential for upholding stakeholder rights and maintaining social license to operate.

6.15 Ethical Subcontracting

SSMI-AD requires full transparency in subcontracting practices among its suppliers. Primary vendors must disclose all third-party subcontractors and ensure that these entities also comply with our human rights and ethical sourcing policies. We regularly map supply chain tiers and conduct random audits to detect undisclosed actors. Where violations are found, we implement corrective measures and may terminate contracts. SSMI-AD works collaboratively with suppliers to build responsible sourcing practices and ensure downstream partners are equally accountable. Unethical subcontracting often conceals labor abuses and compliance risks; we take decisive steps to eliminate these blind spots and uphold integrity across our entire supply chain.

7. ESG Objectives

1. Sustainability Issue

: Transporter Ethics Breach

Objective

: Monitor ethical practices among logistics providers

Measure

: % of transporters audited for ethical compliance

Target Value

: ↑ 65%

2. Sustainability Issue

: Participation to Marginalized Groups

Objective

: Promote inclusive employment by external partners


Measure

: % of vendors with diversity and inclusion policy

Target Value

: ↑ 65%

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- | | |
|--|---|
| 3. Sustainability Issue
Objective
Measure
Target Value | : Grievance Handling Deficiency
: Ensure external workers have access to complaint systems
: % of partners with grievance mechanisms in place
: ↑ 70% |
| 4. Sustainability Issue
Objective
Measure
Target Value | : Whistleblower Actions
: Protect whistleblower rights across third-party operations
: # of reported whistleblower retaliation incidents
: ↓ 0 |
| 5. Sustainability Issue
Objective
Measure
Target Value | : Community Environmental Impact
: Minimize negative effects on local communities
: # of community complaints related to operations
: ↓ 4 |
| 6. Sustainability Issue
Objective
Measure
Target Value | : Exploitative Wages by Third Parties
: Prevent underpayment in supply chain labor
: % of external workers earning above legal minimum
: ↑ 60% |
| 7. Sustainability Issue
Objective
Measure
Target Value | : Extended -Work Periods
: Reduce illegal overtime by third-party employers
: % of workers staying within legal hours
: ↑ 65% |
| 8. Sustainability Issue
Objective
Measure
Target Value | : Violation of Cultural Rights
: Respect religious and cultural practices
: # of cultural rights violation cases reported
: ↓ 0 |
| 9. Sustainability Issue
Objective
Measure
Target Value | : Discrimination by Contractors or Vendors
: Enforce zero-tolerance policies on discrimination
: # of discrimination incidents by external stakeholders
: ↓ 0 |
| 10. Sustainability Issue
Objective
Measure
Target Value | : Child Labor in the Extended Operations
: Eliminate child labor in all indirect activities
: # of child labor cases detected in supply chain
: ↓ 0 |

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11.Sustainability Issue

: Safe Working Conditions for External Workers

Objective

: Improve safety standards for subcontracted labor

Measure

: % of vendors meeting safety compliance

Target Value

: ↑ 100%

12.Sustainability Issue

: Forced Labor in the Supply Chain

Objective

: Ensure all employment is freely chosen

Measure

: # of forced labor incidents identified

Target Value

: ↓ 0

13.Sustainability Issue

: Land Rights Violations During Expansion

Objective

: Protect local land ownership rights

Measure

: # of land-related disputes during projects

Target Value

: ↓ 0

14.Sustainability Issue

: Access to Grievance Mechanisms

Objective

: Ensure grievance channels are open to all affected stakeholders

Measure

: % of community stakeholders aware of grievance process

Target Value

: ↑ 65%

15.Sustainability Issue

: Ethical Subcontracting

Objective

: Prevent engagement with unethical subcontractors

Measure

: % of subcontractors vetted through ESG screening

Target Value

: ↑ 100%

8. Applicable Standards, Laws, and Acts

- UN Global Compact (Principles 1 & 2)
- SA8000 Standard
- OECD Guidelines for Multinational Enterprises
- Aluminum Stewardship Initiative Performance Standard
- UN Guiding Principles on Business and Human Rights
- Global Reporting Initiative (GRI Standards 202, 403, 406, 412)
- Constitution of India (Fundamental Rights)
- Factories Act, 1948
- Rights of Persons with Disabilities Act, 2016
- Contract Labour (Regulation and Abolition) Act, 1970
- Equal Remuneration Act, 1976
- Prevention of Atrocities Act
- Labour Codes (2020)

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9. Distribution and Annual Review

To promote transparency and stakeholder awareness, SSMI-AD publicly shares its Human Rights Policy on the official website and distributes it to suppliers, contractors, service providers, and partners during onboarding. It is also shared with local community leaders, NGOs, and government authorities as part of community engagement. Regular briefings and awareness sessions ensure all stakeholders understand their responsibilities under the policy. The ESG Committee reviews the policy annually, incorporating audit findings, stakeholder feedback, regulatory updates, and evolving risk factors. Recommended changes are approved by the Board and communicated organization-wide, ensuring continued alignment with global human rights standards and practices.

10. Disciplinary Action for Violators

SSMI-AD enforces strict consequences for any violations of this human rights policy. For suppliers or contractors, a clear escalation process is followed: initial warning, followed by suspension, and ultimately termination and blacklisting if non-compliance persists. Internal staff or managers involved in violations are subject to formal disciplinary inquiries, which may result in written warnings or termination. In cases of harm caused, SSMI-AD will initiate remedial actions such as compensation to affected parties, public apologies, and corrective policy updates. These measures reinforce accountability and reflect our zero-tolerance stance toward any infringement of stakeholder human rights.

11. Reporting Mechanism

SSMI-AD provides multiple accessible and secure channels for reporting human rights concerns. These include an online grievance portal, a toll-free human rights helpline, and anonymous drop-boxes installed at key project sites. All reports are handled confidentially and investigated by trained personnel within 15 business days. SSMI-AD guarantees non-retaliation to protect whistleblowers and victims. The reporting mechanisms are clearly communicated to all external stakeholders during onboarding and through public awareness campaigns. This system is designed to empower stakeholders to speak up without fear and ensure timely, fair, and effective resolution of all human rights-related grievances.

12. Conclusion

SSMI-AD is firmly committed to upholding and protecting the human rights of all external stakeholders affected by our operations. We recognize our responsibility to prevent, mitigate, and address any adverse human rights impacts through ethical conduct, transparent engagement, and robust governance. This policy reflects our dedication to building a just, inclusive, and respectful ecosystem rooted in internationally recognized human rights values. By continuously improving our practices and holding ourselves accountable, SSMI-AD aims to foster long-term trust, equity, and social responsibility across all levels of our value chain, from local communities to global business partners.

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5. Security Concern Reporting Policy

SSMI-AD/ESG/POLICY-05

1. Purpose

SSMI-AD is committed to protecting the confidentiality, integrity, and availability of all third-party and company information. This policy establishes a secure, confidential, and accessible whistleblower procedure for stakeholders to report information security concerns, breaches, or vulnerabilities, thereby enabling prompt remediation, compliance with laws, and preservation of stakeholder trust.

2. Scope of Application

This policy applies to all employees (permanent, contractual, or temporary), suppliers, vendors, contractors, customers, business partners, and third-party stakeholders. It covers all business areas including manufacturing, IT, procurement, sales, finance, and administration that handle sensitive or third-party data across all operational locations where SSMI-AD operates.

3. Governance

The Board of Directors oversees policy implementation and compliance. The Information Security Officer (ISO) manages the receipt, investigation, and resolution of reported concerns. The Compliance and Ethics Committee handles escalated cases and enforces disciplinary actions. Departmental heads ensure adherence to information security protocols and support internal reporting and awareness mechanisms.

4. Definition of Terms

☀ Whistleblower

A whistleblower is any individual—employee, vendor, contractor, or stakeholder—who reports concerns regarding breaches, vulnerabilities, or misconduct related to information security. Whistleblowers are encouraged to act in good faith and are entitled to confidentiality and protection against retaliation for raising legitimate concerns about data protection and cyber risks.

☀ Information Security Concern

An information security concern involves any suspected or confirmed breach, misuse, unauthorized access, or system vulnerability that compromises the confidentiality, integrity, or availability of data. These concerns can arise from internal threats, external attacks, or procedural lapses and must be promptly reported for effective resolution and risk mitigation.

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Confidential Information

Confidential information includes sensitive data such as Personally Identifiable Information (PII), intellectual property, financial records, trade secrets, proprietary business processes, and customer or employee records. Protection of this information is critical to preserving trust, ensuring legal compliance, and maintaining the competitive advantage and integrity of SSMI-AD’s business operations.

Retaliation

Retaliation refers to any adverse action—such as demotion, dismissal, harassment, or discrimination—taken against a whistleblower for reporting information security concerns in good faith. SSMI-AD strictly prohibits such behavior and ensures protection measures are in place to safeguard individuals who raise concerns responsibly and truthfully.

5. Roles and Responsibilities

Board of Directors

The Board of Directors provides high-level oversight of the information security whistleblower policy. They ensure alignment with ESG principles, allocate necessary resources, and support the creation of a safe environment for reporting. The Board also reviews periodic reports to evaluate the effectiveness of the whistleblower procedures and corrective actions.

Information Security Officer

The Information Security Officer (ISO) is responsible for receiving, documenting, and investigating reported concerns related to data breaches, system vulnerabilities, or policy violations. The ISO ensures the confidentiality of whistleblower identities, coordinates with relevant departments, and recommends corrective measures to mitigate risks and improve the organization’s information security framework.

Compliance & Ethics Committee

The Compliance & Ethics Committee reviews escalated whistleblower cases involving serious information security concerns. They assess the investigation findings, ensure due process, and recommend appropriate disciplinary or corrective actions. The committee also monitors trends, ensures adherence to legal obligations, and supports the continuous improvement of security policies and procedures.

Employees and Stakeholders

All employees and stakeholders—including third-party vendors, contractors, and partners—are encouraged to report any suspected or actual breaches of information security. They must act in good faith, cooperate with investigations, and adhere to confidentiality guidelines to maintain a secure, ethical, and transparent organizational environment.

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IT and Security Teams

IT and Security Teams are responsible for executing technical investigations, identifying the root cause of reported concerns, and implementing immediate and long-term remediation measures. They also design preventive controls, conduct security audits, and update policies and systems to ensure continuous protection of data and infrastructure.

6. Security Concern Reporting Policy

6.1 Retaliation Against Whistleblowers

SSMI-AD strictly prohibits any form of retaliation against individuals who report information security concerns in good faith. Whistleblowers are protected under company policy and relevant legal frameworks. Protection includes confidentiality, anonymity (if requested), and immunity from disciplinary actions or discrimination. Internal procedures ensure all retaliation complaints are investigated thoroughly and swiftly addressed. By reinforcing a culture of trust and psychological safety, SSMI-AD empowers stakeholders to voice concerns without fear.

6.2 Insider Data Breach

Insider threats can compromise the integrity of critical information. SSMI-AD enforces monitoring tools, access controls, and behavioral analytics to detect anomalous activities early. All employees are encouraged to confidentially report suspicious actions via whistleblower channels. Internal audits and segregation of duties further mitigate the risk. Reported threats are reviewed and acted upon immediately, ensuring both security and employee protection.

6.3 Security Training

Ongoing education is essential for building a secure culture. SSMI-AD conducts mandatory training for employees and key stakeholders on recognizing, preventing, and reporting information security risks. Customized modules are developed for different functions, including IT, HR, and contractors. Refresher training is scheduled annually and updated with emerging threats and policy changes. Training effectiveness is measured to ensure knowledge retention.

6.4 Incident Remediation

SSMI-AD follows a structured, transparent approach to remediating all reported incidents. Each case is tracked using a centralized system that defines timelines, assigns responsibilities, and monitors progress. Investigation results, corrective actions, and preventive steps are documented and communicated to relevant stakeholders. Root cause analysis is mandatory, and lessons learned are integrated into training and system enhancements. This ensures continuous improvement and reduces the likelihood of recurrence. The process strengthens trust in the whistleblower framework by demonstrating that SSMI-AD takes each report seriously and is committed to effective and accountable remediation practices.

6.5 Complaint System Abuse

SSMI-AD safeguards the integrity of its whistleblower system by evaluating the authenticity of all complaints. If a report is found to be deliberately false or malicious, appropriate disciplinary action is taken in accordance with company policies. Regular awareness training emphasizes responsible reporting and the consequences of misuse.

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Internal controls, including anonymous reporting validations and oversight by trained investigators, are designed to discourage false claims. At the same time, genuine complaints are protected and prioritized, ensuring the system remains credible, fair, and secure for all stakeholders while maintaining a culture of integrity and ethical conduct.

6.6 Cultural Barriers to Reporting

SSMI-AD recognizes that cultural sensitivities, language differences, and hierarchical fear can discourage individuals from reporting wrongdoing. To overcome these barriers, the company provides multilingual resources, anonymous reporting channels, and access to third-party counselors. These tools are designed to create a safe, inclusive environment that empowers stakeholders from diverse backgrounds to voice concerns without fear. Regular feedback mechanisms and surveys are conducted to assess and improve the system's accessibility. By addressing cultural barriers proactively, SSMI-AD ensures a reporting framework that is equitable, respectful, and widely trusted across its global operations and supply chain.

6.7 Resources for Investigations

SSMI-AD ensures every report is thoroughly investigated by allocating sufficient resources, including trained investigators, legal advisors, and digital forensic tools. A dedicated team manages whistleblower cases, ensuring professional handling and resolution. Resource needs are reviewed annually based on caseloads and emerging threats to ensure capacity remains aligned with demand. Investigation timelines are closely monitored to avoid backlogs and delays. SSMI-AD's commitment to resourcing reinforces its ability to respond effectively and promptly to all whistleblower reports, thereby upholding system credibility and ensuring that violations are addressed and resolved in a timely and professional manner.

6.8 Reputational Risk Exposure

To safeguard its reputation, SSMI-AD addresses whistleblower incidents swiftly and transparently. Every credible report is acknowledged immediately and followed by a timely investigation. Where required, the company's communication team is prepared to issue fact-based, appropriate statements to stakeholders, regulators, or the media. SSMI-AD's focus is on proactive resolution, not damage control, ensuring accountability and stakeholder trust. By communicating openly and taking corrective actions, the company reinforces its ethical values and strengthens public and partner confidence. Trust is maintained through visible actions, demonstrating that SSMI-AD prioritizes ethics and transparency in all its operations and reporting frameworks.

6.9 Third-Party Security Weaknesses

SSMI-AD recognizes third-party vendors as potential vulnerabilities in its information security framework. To mitigate risks, all suppliers and contractors are required to comply with SSMI-AD's security and whistleblower policies as part of their contractual obligations. Secure onboarding procedures are implemented, followed by periodic reviews and audits to assess compliance with data protection and cybersecurity standards. Any non-compliance results in immediate penalties or termination. These practices ensure that third parties remain aligned with SSMI-AD's expectations, reducing exposure to breaches originating outside the organization and reinforcing the integrity of its broader information security ecosystem.

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6.10 Reporting Channels

SSMI-AD prioritizes confidentiality in all whistleblower reporting processes to foster trust and encourage reporting. Secure digital platforms are used for submission, equipped with encrypted communication and restricted access to authorized personnel only. Anonymous reporting is fully supported, and whistleblowers are not required to disclose their identities unless they choose to. Regular audits and security tests are conducted to evaluate and enhance the robustness of reporting channels. This commitment to confidentiality ensures the protection of whistleblowers, promotes transparency, and strengthens SSMI-AD's information security and ethical governance frameworks.

6.11 Data Compliance Breach

SSMI-AD adheres strictly to applicable data protection laws, including India's Digital Personal Data Protection (DPDP) Act, the General Data Protection Regulation (GDPR), and ISO 27001 standards. All whistleblower reports and investigations are handled in compliance with these regulations to safeguard personal data and ensure lawful processing. A dedicated team of legal advisors and data protection officers oversees compliance, regularly updating policies and training to reflect regulatory developments. Any instance of non-compliance is swiftly addressed with corrective measures, ensuring the organization avoids penalties and maintains its strong reputation for data integrity and legal adherence.

6.12 Reporting Access

SSMI-AD actively fosters awareness of its whistleblower and incident reporting channels across the organization and supply chain. Through employee training sessions, onboarding programs, newsletters, posters, and digital awareness campaigns, stakeholders are regularly informed of their reporting rights and the tools available. These efforts ensure all individuals—employees, suppliers, and contractors—know how to report concerns confidentially and securely. The consistent reinforcement of reporting protocols helps identify vulnerabilities early, promotes a transparent culture, and strengthens SSMI-AD's information security framework by ensuring issues are promptly and properly addressed.


6.13 Incident Response

SSMI-AD ensures a rapid and structured response to all reported information security incidents. Each report is acknowledged within 48 hours, and investigations begin immediately. A streamlined case management system supported by defined roles and escalation protocols enables efficient handling. Service Level Agreements (SLAs) are used to enforce timelines for resolution. Dedicated teams oversee investigation and remediation to prevent delays. This approach minimizes the risk of data breaches, financial losses, and reputational damage, while reinforcing SSMI-AD's commitment to maintaining a resilient and secure information environment.

6.14 Personal Information Leak

To prevent unauthorized disclosure of Personally Identifiable Information (PII), SSMI-AD enforces stringent security controls. These include encrypted storage, secure access restrictions, and regular system audits to monitor compliance. All employees and third-party stakeholders receive training on responsible data handling and are encouraged to report potential breaches through secure whistleblower channels.

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Any reported incidents are investigated immediately, and corrective actions are taken to mitigate harm. Awareness campaigns further reinforce accountability and best practices. This comprehensive approach supports data protection regulations such as the DPDP Act and GDPR while enhancing stakeholder confidence in SSMI-AD's data governance.


6.15 Reporting Integrity Issues

SSMI-AD fosters transparency in its whistleblower program by publishing anonymized annual summaries of reported concerns and their outcomes. These summaries are made available to internal and external stakeholders, highlighting the company's responsiveness, integrity, and commitment to ethical governance. Transparency not only builds trust in the system but also encourages more people to report legitimate concerns. Feedback on these reports is actively solicited and used to refine procedures, improve reporting systems, and increase the credibility of the program. By making outcomes visible, SSMI-AD strengthens the effectiveness and reliability of its information security whistleblower process.

7. ESG Objectives

- 1. Sustainability Issue : Retaliation Against Whistleblowers**
Objective : Ensure protection and anonymity for whistleblowers
Measure : # of retaliation cases reported
Target Value : ↓ 0
- 2. Sustainability Issue : Insider Data Breach**
Objective : Prevent internal misuse of sensitive whistleblower data
Measure : # of internal data breach incidents
Target Value : ↓ 0
- 3. Sustainability Issue : Insufficient Security Training**
Objective : Train employees on secure handling of whistleblower data
Measure : % of staff trained in whistleblower data security
Target Value : ↑ 100%
- 4. Sustainability Issue : Insufficient Incident Remediation**
Objective : Strengthen corrective actions post-whistleblower reports
Measure : % of verified reports with follow-up action
Target Value : ↑ 85%
- 5. Sustainability Issue : Complaint System Abuse**
Objective : Prevent false or malicious reporting
Measure : % of substantiated whistleblower reports
Target Value : ↑ 60%

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6. Sustainability Issue

: Cultural Barriers to Reporting

Objective

: Encourage reporting across all employee groups

Measure

: % increase in whistleblower submissions from diverse groups

Target Value

: ↑ 15%

7. Sustainability Issue

: Resources for Investigations

Objective

: Allocate trained personnel for report handling

Measure

: % of cases investigated by trained ESG staff

Target Value

: ↑ 100%

8. Sustainability Issue

: Reputational Risk Exposure

Objective

: Manage risks arising from data leaks and mishandling

Measure

: # of whistleblower-related reputational incidents

Target Value

: ↓ 0

9. Sustainability Issue

: Third-Party Security Weaknesses

Objective

: Ensure external platforms used are secure

Measure

: % of third-party systems audited for security

Target Value

: ↑ 100%

10. Sustainability Issue

: Reporting Channels

Objective

: Secure and encrypt all whistleblower submissions

Measure

: % of reports made through encrypted systems

Target Value

: ↑ 60%

11. Sustainability Issue

: Data Compliance Breach

Objective

: Comply with applicable data protection laws

Measure

: % of whistleblower cases handled in compliance with data laws

Target Value

: ↑ 75%

12. Sustainability Issue

: Reporting Access

Objective

: Improve awareness of reporting tools and policies

Measure

: % of employees aware of whistleblower procedures

Target Value

: ↑ 85%

13. Sustainability Issue

: Incident Response

Objective

: Reduce response time to whistleblower concerns

Measure

: % of reports responded to within 7 days

Target Value

: ↑ 65%

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14.Sustainability Issue

: Personal Information Leak

Objective

: Protect identity and sensitive details of whistleblowers

Measure

: # of personal information leaks

Target Value

: ↓ 0

15.Sustainability Issue

: Reporting Integrity Issues

Objective

: Ensure credibility and completeness of report data

Measure

: % of reports with verified documentation

Target Value

: ↑ 100%

8. Applicable Standards, Laws, and Acts

- Information Technology Act 2000 (and amendments),
- Companies Act 2013, Personal Data Protection Bill (pending),
- FCPA, Aluminum Stewardship Initiative,
- UN Global Compact,
- OECD Guidelines for Multinational Enterprises,
- GRI Standards.
- Compliance with local data privacy and cybersecurity regulations is mandatory.

9. Distribution and Annual Review

SSMI-AD ensures effective dissemination of its Information Security Whistleblower Policy through induction programs, regular training, intranet access, and multi-language distribution in digital and print formats. The policy is shared with suppliers, contractors, and third parties during onboarding and contract renewals to reinforce expectations. This inclusive communication ensures all stakeholders understand their responsibilities and reporting channels. The policy is reviewed annually by the Information Security Officer, incorporating audit results, incident findings, stakeholder feedback, and regulatory updates. Revisions are approved by the Board, ensuring continued relevance, alignment with ESG principles, and responsiveness to emerging threats, thereby promoting data security and a culture of integrity.

10. Disciplinary Action for Violators

Any verified violation of the Information Security Whistleblower Policy—whether involving breaches of data confidentiality, retaliation against whistleblowers, or interference in investigation processes—will result in strict disciplinary action. Measures may include verbal/written warnings, suspension, termination of employment or contract, and where necessary, legal prosecution. Equally, knowingly submitting false or malicious reports to harm individuals or disrupt operations will also trigger corrective actions. SSMI-AD enforces these consequences consistently to maintain a secure, respectful, and ethically sound work environment. This policy deters misconduct, upholds accountability, and strengthens organizational trust in the information security and whistleblower management framework.

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11. Reporting Mechanism

SSMI-AD provides multiple secure, confidential channels for reporting information security concerns. Whistleblowers may use a dedicated secure email address, an anonymous hotline, or a web-based portal managed by an independent third-party to ensure objectivity and confidentiality. Reports are acknowledged within 48 hours, and investigations are initiated promptly. Whistleblowers have the option to remain anonymous and are guaranteed protection from retaliation. All concerns are treated seriously, with the highest standards of discretion and impartiality. This comprehensive mechanism encourages proactive reporting, helps mitigate risks, and reassures stakeholders that their concerns will be handled with integrity and urgency.

12. Conclusion

SSMI-AD's Information Security Whistleblower Policy reflects its unwavering commitment to transparency, accountability, and ethical business practices. By providing a safe platform for reporting breaches and ensuring prompt corrective action, the policy reinforces a culture of trust and vigilance. It plays a critical role in risk management, safeguarding the confidentiality, integrity, and availability of data. Additionally, the policy supports regulatory compliance and demonstrates SSMI-AD's proactive approach to ESG integration and stakeholder engagement. Through this policy, the company empowers employees and partners to act against threats and contributes to a secure and responsible digital and operational environment.

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6. Supplier Conduct Policy

SSMI-AD/ESG/POLICY-06

1. Purpose

SSMI-AD aims to clearly communicate its expectations for suppliers to operate ethically, responsibly, and sustainably. This includes upholding human rights, fair labor practices, environmental protection, anti-corruption measures, and business integrity across all tiers of the supply chain. Our goal is to foster transparent, accountable partnerships that align with our ESG principles and support long-term sustainable development.

2. Scope of Application

This policy applies to all current and prospective suppliers, contractors, manufacturers, processors, and service providers engaged with SSMI-AD. It covers all areas of supplier operations, including labor, environment, production, procurement, logistics, and subcontracting, across the entire supply chain—both within India and internationally—to ensure consistent ethical and sustainable practices.

3. Governance

The Procurement & ESG Committee is responsible for overseeing adherence to and periodic updates of this Code. SSMI-AD's Compliance Team handles supplier onboarding, compliance audits, and investigations. Additionally, SSMI-AD may engage qualified third-party auditors or verifiers to ensure supplier practices align with ethical, legal, and sustainability requirements.

4. Definition of Terms

✿ Supplier

A supplier is any organization, entity, or individual that provides goods, raw materials, components, or services to SSMI-AD directly or indirectly. This includes contractors, subcontractors, manufacturers, and service providers engaged in the supply chain operations related to sourcing, production, packaging, logistics, or maintenance.

✿ Sustainability

Sustainability at SSMI-AD refers to conducting business in a way that ensures long-term environmental protection, upholds human and labor rights, promotes ethical governance, and drives economic resilience. It involves responsible resource use, pollution prevention, and equitable practices that positively impact people, the planet, and future generations.

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Human Rights Principles

SSMI-AD's Human Rights Principles are grounded in international standards, including the United Nations Global Compact (UNGC), OECD Guidelines for Multinational Enterprises, and the International Labour Organization's (ILO) Core Conventions. These principles safeguard freedom of association, prohibit forced and child labor, and ensure fair, safe, and non-discriminatory working conditions.

Conflict Minerals

Conflict minerals refer to specific raw materials—such as tin, tungsten, tantalum, and gold—extracted from regions experiencing armed conflict or human rights abuses, particularly in the Democratic Republic of Congo and adjoining countries. SSMI-AD discourages sourcing from these regions unless suppliers provide verified, conflict-free sourcing certifications.

5. Roles & Responsibilities

Suppliers

Suppliers are required to comply with the SSMI-AD Supplier Code of Conduct, implement internal monitoring and self-assessment processes, and grant access for scheduled or unannounced audits. They must actively address non-compliance issues and demonstrate continuous improvement in labor practices, environmental performance, ethical conduct, and human rights adherence.

SSMI-AD

SSMI-AD is responsible for equipping suppliers with the necessary tools, training, and guidance to meet ESG expectations. The company fosters collaboration by providing resources, templates, and awareness sessions to ensure that suppliers understand their obligations and align their operations with SSMI-AD's sustainability and ethical sourcing standards.

Third-Party Auditors

Independent third-party auditors, appointed by SSMI-AD, are authorized to perform objective assessments of supplier compliance through documentation reviews, site inspections, and stakeholder interviews. They provide unbiased reports detailing areas of conformance, gaps, and recommendations to support transparency and ongoing improvements across the supply chain.

ESG Committee

The ESG Committee is responsible for evaluating audit findings, monitoring supplier performance, and recommending appropriate corrective or disciplinary actions. In cases of repeated or severe non-compliance, the committee is authorized to suspend, delist, or terminate supplier relationships to uphold SSMI-AD's commitment to ethical and sustainable procurement.

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6. Supplier Conduct Policy

6.1 Fair Wages & Benefits

Suppliers are required to provide compensation that meets or exceeds the legal minimum wage and includes all mandatory benefits such as overtime, paid leave, and insurance contributions. Wages must be paid in full and on time, in accordance with applicable laws. Deductions must be legal and transparent. Employment contracts must clearly outline compensation and benefits, and should be explained to employees in a language they understand. SSMI-AD expects suppliers to ensure pay equity and fair wage practices for all workers, with particular emphasis on non-discrimination based on gender, age, or other protected characteristics. Economic justice is core to sustainable sourcing.

6.2 Excessive Working Hours

Suppliers must comply with applicable laws and industry standards regarding working hours, including regular and overtime limits. Employees must receive adequate rest periods, weekly off-days, and holiday entitlements. Extended working hours should only be voluntary and fairly compensated. Recordkeeping for working hours must be transparent, and workers must be educated about their rights to rest and overtime pay. Suppliers are responsible for monitoring schedules to prevent fatigue, stress, or burnout, which can affect health, productivity, and morale. Ethical labor practices require respecting human limits and enabling a balanced work-life environment in all supplier facilities.

6.3 Grievance System

Suppliers must establish accessible, confidential, and effective grievance mechanisms for employees to voice concerns or complaints. These systems must allow anonymous reporting and ensure protection against retaliation. Grievance channels should be well-communicated and understood by all workers, regardless of language or literacy levels. Suppliers are expected to document, investigate, and resolve complaints in a timely and fair manner. Feedback from grievance systems must be used to improve workplace practices. Ensuring a safe platform for employee voices strengthens trust, transparency, and accountability, and supports proactive resolution of workplace issues before escalation.

6.4 Worker Voice or Representation

Suppliers must respect the right of workers to freely associate, organize, and bargain collectively, in accordance with national laws and international standards. Workers must be allowed to choose representatives, form committees, or engage in collective discussions without fear of discrimination or retaliation. Suppliers are encouraged to facilitate regular dialogue between management and worker representatives, ensuring transparent and constructive communication. Creating an enabling environment for worker voice contributes to better decision-making, stronger workplace culture, and early resolution of grievances. Respect for employee representation is a key indicator of ethical and inclusive labour management.

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6.5 Health Impacts on Local Communities

Suppliers must identify and mitigate any adverse health or environmental impacts their operations may have on surrounding communities. This includes the management of emissions, waste, wastewater discharge, noise, and hazardous substances. Suppliers are required to conduct community impact assessments and engage with stakeholders to address concerns. Emergency preparedness, pollution prevention, and remediation plans must be in place. Suppliers must respond promptly to complaints and strive to maintain good community relations. Protecting the health and well-being of neighboring populations reinforces the supplier's social license to operate and promotes long-term sustainability.

6.6 Reversible Environmental Damage

Suppliers must implement robust environmental management systems to prevent irreversible harm to ecosystems. This includes responsible sourcing of raw materials, efficient use of natural resources, emissions control, waste reduction, and biodiversity protection. Suppliers must comply with applicable environmental laws and strive for continuous improvement in sustainability practices. Proactive adoption of resource-efficient technologies and renewable energy is encouraged. Suppliers must avoid illegal deforestation, pollution of water bodies, and other high-impact activities. Environmental stewardship is essential not only for regulatory compliance but also for preserving natural resources for future generations and aligning with global climate goals.

6.7 Corruption & Bribery in Supply Chain

Suppliers must adopt and enforce zero-tolerance policies on bribery, fraud, extortion, and other corrupt practices. They must not offer, accept, or solicit improper payments or advantages to secure business or influence decisions. Suppliers are expected to maintain transparent accounting systems, conduct due diligence on third parties, and implement anti-corruption training and controls. Whistleblower protections must be in place to encourage reporting of misconduct. Upholding integrity is fundamental to ethical procurement and builds trust across the value chain. Suppliers who engage in corrupt behavior pose serious reputational and legal risks to themselves and to SSMI-AD.

6.8 Conflict Mineral Sourcing

Suppliers must ensure that the minerals used in their products do not finance or contribute to conflict in high-risk areas, especially regions identified in the DRC and adjoining countries. Suppliers must conduct supply chain due diligence in accordance with OECD Due Diligence Guidance and the Conflict-Free Sourcing Initiative (CFSI). Documentation and traceability of mineral sources are essential. Suppliers must collaborate with their sub-suppliers to avoid sourcing from entities involved in armed violence, human rights abuses, or environmental destruction. Ethical sourcing of raw materials is a key aspect of responsible supply chain management.

6.9 Child Labour

Suppliers are strictly prohibited from engaging in any form of child labour. Individuals under the age of 15 or the minimum working age defined by local laws, whichever is higher, must not be employed. Suppliers must implement effective age verification systems and maintain accurate records. They are responsible for ensuring that no hazardous or exploitative work conditions exist for young workers, where legally permitted.

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In the event of any child labour incident, suppliers must take immediate and effective remediation steps. Creating a safe and supportive working environment for all employees, especially youth, is essential for ethical supply chain conduct.

6.10 Forced or Bonded Labour

Suppliers must ensure that all employment is voluntary and free from coercion, threats, or illegal practices such as bonded, indentured, or prison labour. Workers must not be forced to surrender identity documents, incur recruitment-related debts, or work under exploitative contracts. Suppliers must regularly train staff and subcontractors on ethical labour standards and monitor for any violations. Recruitment fees must be borne by employers, not workers. All employment agreements must be transparent, accessible, and understandable. Upholding freedom and dignity in the workplace is non-negotiable and forms a fundamental requirement of SSMI-AD's supplier responsibility expectations.

6.11 Safe Working Conditions

Suppliers must provide a safe, healthy, and hygienic working environment, compliant with relevant health and safety laws. Regular risk assessments must be conducted, and appropriate personal protective equipment (PPE), safety protocols, emergency response systems, and health training must be provided. Suppliers are responsible for identifying hazards and taking preventive actions to minimize risks. All incidents, near misses, and illnesses must be reported, investigated, and addressed. Continuous improvement of occupational health and safety practices is vital to prevent accidents and promote worker well-being. Suppliers must foster a culture of safety at every level of operation.

6.12 Respectful Labour Practices

Suppliers must prohibit all forms of discrimination, harassment, bullying, and abuse in the workplace. Employment decisions must be based on merit, skills, and qualifications, without regard to race, gender, religion, caste, age, disability, sexual orientation, or political beliefs. A respectful and inclusive work environment must be maintained. Verbal, physical, or sexual abuse, as well as any form of intimidation or retribution, is strictly forbidden. Suppliers must implement anti-discrimination policies, grievance procedures, and regular training for all employees. Upholding dignity and fairness in employment practices is central to SSMI-AD's ESG commitments and ethical sourcing principles.

6.13 Intellectual property use

Suppliers must protect SSMI-AD's intellectual property, trade secrets, proprietary information, and data from unauthorized use, disclosure, or theft. Confidentiality agreements must be in place and strictly enforced. Suppliers must ensure that their employees and subcontractors are trained on information security protocols and comply with relevant data protection laws. Unauthorized duplication, distribution, or use of SSMI-AD's intellectual assets is a serious violation. All electronic and physical data must be handled securely. Upholding intellectual property rights ensures innovation, protects business value, and promotes ethical collaboration across the supply chain.

6.14 Supply Disruption from Social rest

Suppliers must anticipate and manage risks from social unrest, political instability, or civil conflict that may affect their operations. Business continuity plans must include social risk assessments and mitigation strategies. Suppliers should engage with local communities and authorities to foster positive relations and avoid disruption.

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Operations should be flexible and responsive to emerging threats. In the event of unrest, suppliers must have emergency protocols to protect employees and maintain critical operations. Resilience to socio-political shocks enhances reliability and ensures uninterrupted service to SSMI-AD and its customers.

6.15 Posing ESG Risk via Sub-Contractors

Suppliers are responsible for ensuring that their subcontractors comply with SSMI-AD's ESG Code and related standards. ESG requirements must be clearly communicated, and contractual obligations must be enforced down the supply chain. Suppliers must regularly monitor and assess subcontractor practices and take corrective action when needed. Cascading ESG compliance through all tiers of the supply network ensures consistency, transparency, and accountability. Failure to control subcontractor risks can result in reputational, legal, and operational impacts. Ethical outsourcing practices are essential to maintaining high standards across the entire value chain.

7. ESG Objectives

1. Sustainability Issue

: Fair Wages & Benefits

Objective

: Ensure suppliers provide fair compensation

Measure

: % of suppliers audited for wage compliance

Target Value

: ↑ 100%

2. Sustainability Issue

: Excessive Working Hours

Objective

: Prevent overwork among supplier employees

Measure

: % of suppliers adhering to legal work-hour limits

Target Value

: ↑ 85%

3. Sustainability Issue

: Grievance System

Objective

: Require grievance mechanisms for all supplier workers

Measure

: % of suppliers with grievance systems in place

Target Value

: ↑ 65%

4. Sustainability Issue

: Worker Voice or Representation

Objective

: Promote worker participation and representation

Measure

: % of suppliers supporting worker committees or unions

Target Value

: ↑ 70%

5. Sustainability Issue

: Health Impacts on Local Communities

Objective

: Minimize negative health effects from supplier operations


Measure

: # of health complaints reported from local communities

Target Value

: ↓ 0

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6. Sustainability Issue

: Reversible Environmental Damage

Objective

: Prevent environmentally harmful supplier activities

Measure

: % of suppliers with verified environmental safeguards

Target Value

: ↑ 100%

7. Sustainability Issue

: Corruption & Bribery in Supply Chain

Objective

: Enforce anti-bribery policies among suppliers

Measure

: % of suppliers signing anti-corruption declarations

Target Value

: ↑ 60%

8. Sustainability Issue

: Conflict Mineral Sourcing

Objective

: Eliminate sourcing from conflict-affected areas

Measure

: % of material suppliers providing conflict-free certification

Target Value

: ↑ 70%

9. Sustainability Issue

: Child Labour

Objective

: Ensure zero child labor across the supply chain

Measure

: # of child labor cases identified during audits

Target Value

: ↓ 0

10. Sustainability Issue

: Forced or Bonded Labour

Objective

: Prevent coercive labor practices

Measure

: % of suppliers with verified fair labor practices

Target Value

: ↑ 75%

11. Sustainability Issue

: Safe Working Conditions

Objective

: Improve health and safety standards at supplier sites

Measure

: % of suppliers meeting occupational safety standards

Target Value

: ↑ 80%

12. Sustainability Issue

: Respectful Labour Practices

Objective

: Promote respectful and ethical treatment of workers

Measure

: % of suppliers with zero-tolerance labor conduct policies

Target Value

: ↑ 70%

13. Sustainability Issue

: Intellectual property use

Objective

: Protect intellectual property in supplier engagements

Measure

: % of supplier contracts with IP protection clauses

Target Value

: ↑ 60%

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14.Sustainability Issue

: Supply Disruption from Social rest

Objective

: Build resilience in supply continuity

Measure

: % of suppliers with social risk mitigation plans

Target Value

: ↑ 65%

15.Sustainability Issue

: Posing ESG Risk via Sub-Contractors

Objective

: Extend ESG compliance to all subcontracted operations

Measure

: % of subcontractors vetted for ESG risk

Target Value

: ↑ 60%

8. Applicable Standards, Laws & Acts

- UN Global Compact, OECD Guidelines,
- ASI, CFSI, GRI, ILO,
- OECD Conflict Minerals Guidance.
- National (India): Labour laws,
- Environmental laws,
- Prevention of Corruption Act.
- Industry-specific: ISO 14001, ISO 45001.

9. Distribution and Annual Review

SSMI-AD ensures the Supplier Code of Conduct is clearly communicated and easily accessible. It is provided to all suppliers during onboarding and hosted permanently on the procurement portal. Bilingual summaries enhance understanding across diverse regions. The Code is included in training materials and discussed during workshops and ESG programs. Suppliers are encouraged to share it with their subcontractors to promote widespread compliance. An annual review by the ESG Committee, with input from legal, compliance, and external advisors, ensures the Code reflects evolving laws and ESG risks. Revised versions are redistributed to support ongoing alignment, supplier accountability, and continuous improvement.

10. Disciplinary Action for Violators

SSMI-AD adopts a progressive approach to enforcement. For minor or first-time violations, suppliers are asked to submit corrective action plans and demonstrate improvement within a defined timeframe. However, repeated, severe, or unaddressed violations may result in consequences such as temporary suspension, termination of contract, removal from the approved vendor list, or referral to legal authorities. Disciplinary measures are determined based on the severity, intent, and recurrence of non-compliance. SSMI-AD reserves the right to take immediate action in cases involving child labor, forced labor, corruption, or serious environmental damage, thereby reinforcing the seriousness of supplier accountability.

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11. Reporting Mechanism

SSMI-AD promotes a safe, transparent, and confidential reporting environment for suppliers, workers, and other stakeholders. Code violations can be reported via a dedicated email address nagaraj@sreesumangala.com, an anonymous hotline, or a secure web portal. These channels are accessible in multiple languages to ensure inclusivity. All reports are investigated thoroughly, and confidentiality is maintained throughout the process. SSMI-AD enforces a strict non-retaliation policy to protect whistleblowers from any adverse consequences. Feedback mechanisms ensure complainants are informed of the resolution. These mechanisms reflect SSMI-AD's commitment to ethical conduct and help identify and resolve issues proactively across the supply chain.

12. Conclusion

A responsible and resilient supply chain is built on mutual respect, transparency, and ethical commitment. SSMI-AD expects all suppliers to actively uphold the principles set out in this Code of Conduct, including fair labor practices, environmental sustainability, and zero tolerance for corruption or human rights violations. Compliance with this Code strengthens business relationships, enhances supplier credibility, and contributes to long-term ESG performance. SSMI-AD is committed to supporting suppliers through collaboration, training, and performance monitoring. Together, we can foster a culture of integrity and sustainability that benefits workers, communities, the environment, and the shared success of all stakeholders involved.

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7. Financial Crime Control Policy

SSMI-AD/ESG/POLICY-07

1. Purpose

This policy affirms SSMI-AD's commitment to combating money laundering by safeguarding its operations from illicit financial activities. It ensures adherence to anti-money laundering (AML) laws, promotes ethical business conduct, and reinforces internal controls to detect, report, and prevent suspicious transactions that may compromise the company's financial and reputational integrity.

2. Scope of Application

This policy applies to all employees, contractors, vendors, agents, and third-party intermediaries associated with SSMI-AD. It covers all core business functions, including manufacturing, procurement, sales, logistics, and finance. The geographical scope includes all operations within India and any international transactions or business activities involving SSMI-AD entities or affiliates.

3. Governance

The Chief Compliance Officer (CCO) is responsible for overseeing anti-money laundering (AML) compliance and ensuring timely reporting of suspicious activities. The Board of Directors provides strategic oversight and ensures the effective implementation and monitoring of the policy. Department Heads are accountable for enforcing policy adherence across their respective teams and operations.

4. Definitions

✿ Money Laundering

Money laundering is the act of disguising the origins of illegally obtained money to make it appear legitimate. It typically involves multiple complex transactions through businesses or financial systems to conceal the criminal source, thereby integrating illicit funds into the legal economy.

✿ Beneficial Ownership

Beneficial ownership refers to the natural person(s) who ultimately own or control a customer, account, or transaction. It identifies individuals with significant ownership or influence, even if they are not formally named, ensuring transparency and accountability in financial dealings.

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Know Your Customer (KYC)

KYC refers to mandatory procedures that verify the identity of clients and third parties before initiating a business relationship. This includes collecting valid documentation, assessing risk profiles, and conducting ongoing monitoring to prevent money laundering, fraud, or illicit financing activities.

5. Roles and Responsibilities

Board of Directors

The Board of Directors provides strategic oversight of the Anti-Money Laundering (AML) policy, ensuring it aligns with SSMI-AD's risk management framework. They review periodic assessments, evaluate high-risk areas, and ensure that adequate resources and governance mechanisms are in place to prevent and address money laundering risks effectively.

Chief Compliance Officer (CCO)

The CCO is responsible for developing and updating the AML policy, conducting employee training, investigating suspicious transactions, and ensuring timely regulatory reporting. The CCO collaborates with internal departments to enforce compliance and leads efforts to stay aligned with evolving AML laws, best practices, and global ethical standards.

Department Heads

Department Heads are responsible for implementing the AML policy within their respective functions. They monitor adherence to internal controls, ensure team members follow due diligence procedures, and promptly escalate potential violations. They serve as the first line of defense in detecting and mitigating AML risks at the operational level.

Employees

All employees are required to understand and comply with AML procedures. They must perform appropriate due diligence, maintain accurate records, and immediately report any suspicious activity through designated channels. Employees play a critical role in safeguarding SSMI-AD's operations from being exploited for illegal financial activities.

6. Financial Crime Control Policy

6.1 Corruption in Procurement

SSMI-AD maintains a zero-tolerance stance on all forms of corruption, including bribery and facilitation payments. Any attempt to offer or accept unauthorized commissions, gifts, or payments to influence business decisions is strictly forbidden. Our business activities align with anti-corruption frameworks such as the Foreign Corrupt Practices Act (FCPA) and the UN Global Compact's 10th Principle. Employees and suppliers are expected to conduct themselves with integrity and disclose any attempted or suspected bribery. Internal audits and compliance checks help enforce this policy and mitigate risks associated with unethical financial conduct and governmental interactions.

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6.2 Militant Funding Channels

To prevent financial support to armed groups or criminal networks, SSMI-AD mandates thorough vetting of the origin and destination of all funds. We avoid transactions involving entities or regions flagged for terrorism financing or political instability unless verified for legitimacy. All payments are routed through legal and regulated banking systems, and any transaction linked to suspicious jurisdictions is subject to senior-level approval. The company employs geopolitical risk analysis and engages with legal advisors to ensure compliance. This helps uphold our commitment to peace, ethical conduct, and international human rights obligations.

6.3 Legal Process Resistance

SSMI-AD fully cooperates with all government agencies and regulatory authorities investigating anti-money laundering violations or suspicious financial activity. All requested information, including transaction records, contract documentation, and audit logs, will be shared in a timely and lawful manner. The company maintains updated legal protocols for data preservation and access in compliance with national and international regulations. Designated compliance personnel act as liaisons during investigations. By fostering an open and responsive relationship with law enforcement, SSMI-AD demonstrates its unwavering commitment to financial integrity and legal accountability.

6.4 Whistleblower Protection

SSMI-AD supports a safe and anonymous reporting environment for employees, contractors, and stakeholders to report money laundering risks or suspicious activities. Whistleblowers are protected from retaliation under a structured policy aligned with best practices and legal standards. Reports can be submitted via internal hotlines, emails, or third-party portals, and are handled with utmost confidentiality. Investigations are conducted independently by compliance officers, and corrective actions are taken without exposing the identity of the whistleblower. This encourages a transparent culture and strengthens the early detection of non-compliant or unethical practices.

6.5 Funded Rights Breaches

SSMI-AD is committed to ensuring that its financial transactions do not indirectly fund human rights abuses, including child labor, human trafficking, or exploitation. We implement ESG due diligence protocols to assess the social and ethical risks associated with vendors and counterparties. If any red flags are raised regarding human rights violations, the transaction is suspended pending further investigation. Contracts require adherence to human rights principles, and violations may result in termination. This policy aligns with global standards, including the UN Guiding Principles on Business and Human Rights.

6.6 Internal Criminal Collusion

SSMI-AD has implemented internal control mechanisms to prevent collusion between employees and criminal organizations. Sensitive roles within procurement, finance, and compliance are subject to real-time monitoring and periodic background checks. Unscheduled audits and forensic reviews are conducted to detect unusual behavior or transaction patterns. Employees are trained to recognize red flags and are encouraged to report any suspicious colleague behavior. Violations are investigated with confidentiality, and proven misconduct results in termination and possible legal action. This policy reinforces accountability and protects against internal facilitation of financial crimes.

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6.7 Employee Training on AML

SSMI-AD mandates annual anti-money laundering (AML) training for all employees, with specialized sessions for departments like procurement, sales, and finance. Training modules include the identification of suspicious activities, reporting procedures, global AML regulations, and internal controls. New employees receive onboarding training within 30 days of joining. The compliance team regularly updates the curriculum to reflect emerging threats and legal changes. Participation is mandatory, and completion is tracked through internal systems. This ensures that our workforce remains vigilant, knowledgeable, and equipped to prevent and detect money laundering within their roles.

6.8 Aggressive Tax Practices

SSMI-AD discourages any use of tax havens or low-transparency jurisdictions for financial advantage. The establishment of any legal entity or banking relationship in such regions must undergo senior-level review and provide legitimate business substance. We conduct risk assessments to ensure such jurisdictions are not being used for money laundering or tax avoidance. Transparency in our legal structures and financial operations is a key pillar of our ESG and ethical business strategy. This policy supports our goal of maintaining credibility with stakeholders and regulators.

6.9 Use of Cash-Based Transactions

SSMI-AD restricts the use of cash in all business transactions to promote traceability and prevent misuse. Any cash transaction exceeding ₹50,000 is strictly prohibited and must be rerouted through authorized banking channels. Exceptions require documented justification and management approval. The company encourages digital payments for both local and international dealings. This policy reduces exposure to financial fraud, tax evasion, and laundering risks associated with untraceable cash movements. Employees found violating this policy will be subject to internal investigation and disciplinary measures, reinforcing financial discipline and compliance.

6.10 Third-party Complicity in Laundering

SSMI-AD requires all third-party vendors, contractors, and suppliers to undergo comprehensive anti-money laundering (AML) checks before onboarding. These checks include verifying ownership details, past regulatory violations, and risk level based on jurisdiction. Contracts must include AML compliance clauses, and periodic re-evaluation ensures continued alignment with our ethical standards. Vendors operating in sectors prone to financial misconduct are subject to enhanced monitoring and additional controls. This policy helps prevent indirect facilitation of laundering through vendors and reinforces our accountability in choosing business partners that meet our compliance benchmarks.

6.11 Disclosed Entity Ties

SSMI-AD strictly prohibits engagement with shell companies or front organizations used to obscure illicit financial activities or to facilitate money laundering. All third-party associations, especially in high-risk jurisdictions, are subject to enhanced due diligence and vetting processes. Our due diligence includes assessing the legitimacy, ownership transparency, and business substance of these entities. Transactions or contracts with opaque or suspicious counterparties are flagged for further investigation and approval by senior compliance officers. This approach helps ensure that we remain aligned with our ethical business standards and comply with anti-money laundering (AML) and anti-terrorism financing regulations.

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6.12 Financial Dealings

SSMI-AD mandates complete transparency in all financial transactions, both incoming and outgoing. Each financial record must be supported by accurate documentation, clearly stating the purpose, involved parties, and amounts. Payment approvals require a documented trail and multi-level verification to prevent untraceable fund flows. Suspicious or undocumented financial movements are automatically flagged and escalated to our finance and compliance teams. This policy ensures that SSMI-AD's financial practices are auditable, traceable, and aligned with both domestic and international financial integrity requirements, thereby reducing the risk of inadvertently facilitating money laundering or corruption.

6.13 Identity Obfuscation in Contracts

SSMI-AD enforces full disclosure of beneficial ownership in all contractual engagements. Contracts must clearly state the legal and beneficial owners, along with the identities of authorized signatories. Any attempt to use proxies, anonymous companies, or nominee structures to obscure ownership will result in termination of the business relationship. This transparency is critical in detecting hidden relationships or financial interests that could pose AML risks. Legal and compliance teams verify all ownership details through reliable sources before contract approval, ensuring all partnerships are accountable and transparent.


6.14 Supplier Misconduct Not Tracked

SSMI-AD integrates AML compliance checks into all supplier evaluation and monitoring processes. Each supplier contract includes clauses mandating compliance with anti-money laundering regulations and periodic audits. Non-compliant suppliers are subject to warnings, re-audits, or termination depending on the severity of the violation. High-risk suppliers are prioritized for more frequent audits and closer monitoring. The procurement and compliance teams work together to ensure that no supplier misconduct goes unnoticed. This policy safeguards the company from indirect exposure to financial crimes through third-party misconduct.

6.15 Reported Beneficial Ownership

SSMI-AD mandates disclosure of beneficial ownership details from all vendors, customers, and third parties as part of onboarding. These disclosures must be verifiable through independent sources and are a prerequisite for engagement. Contracts that lack full ownership details are considered incomplete and are not processed. This policy eliminates the possibility of anonymous transactions and ensures that all involved parties are identifiable. Any discrepancies or false disclosures are investigated, and the associated party is blacklisted if found guilty. The approach strengthens transparency and regulatory compliance across all partnerships.

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7. ESG Objectives

1. Sustainability Issue

Objective

Measure

Target Value

: Corruption in Procurement

: Eliminate financial misconduct in sourcing

: % of procurement transactions independently audited

: ↑ 70%

2. Sustainability Issue

Objective

Measure

Target Value

: Militant Funding Channels

: Prevent linkages to extremist financing

: # of transactions flagged for suspicious links

: ↓ 0

3. Sustainability Issue

Objective

Measure

Target Value

: Legal Process Resistance

: Cooperate fully with regulatory investigations

: % of legal requests responded to on time

: ↑ 90%

4. Sustainability Issue

Objective

Measure

Target Value

: Whistleblower Protection

: Encourage secure reporting of suspicious activity

: % of whistleblower cases protected from retaliation

: ↑ 75%

5. Sustainability Issue

Objective

Measure

Target Value

: Funded Rights Breaches

: Prevent misuse of funds that violate human rights

: # of ESG fund misuse cases

: ↓ 0

6. Sustainability Issue

Objective

Measure

Target Value

: Internal Criminal Collusion

: Detect and prevent internal fraudulent alliances

: % of financial irregularities linked to internal collusion

: ↓ 0

7. Sustainability Issue

Objective

Measure

Target Value


: Employee Training on AML

: Build employee awareness of money laundering risks

: % of employees trained in AML compliance

: ↑ 90%

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8. Sustainability Issue

: Aggressive Tax Practices

Objective

: Ensure ethical tax planning

Measure

: % of tax filings compliant with global tax norms

Target Value

: ↑ 75%

9. Sustainability Issue

: Use of Cash-Based Transactions

Objective

: Minimize high-risk cash operations

Measure

: % of total transactions conducted via non-cash modes

Target Value

: ↑ 70%

10. Sustainability Issue

: Third-party Complicity in Laundering

Objective

: Identify high-risk vendors

Measure

: % of vendors screened for AML risks

Target Value

: ↑ 70%

11. Sustainability Issue

: Undisclosed Entity Ties

Objective

: Ensure transparency of all business partners

Measure

: % of third parties disclosing ownership structures

Target Value

: ↑ 65%

12. Sustainability Issue

: Financial Dealings

Objective

: Maintain transparency in financial flows

Measure

: % of transactions with documented audit trail

Target Value

: ↑ 90%

13. Sustainability Issue

: Identity Obfuscation in Contracts

Objective

: Verify identities in all contractual engagements

Measure

: % of contracts with verified entity identification

Target Value

: ↑ 90%

14. Sustainability Issue

: Supplier Misconduct Not Tracked

Objective

: Monitor financial conduct of suppliers

Measure

: % of suppliers subject to compliance audits

Target Value

: ↑ 100%

15. Sustainability Issue

: Reported Beneficial Ownership

Objective

: Disclose true ownership of partners and vendors

Measure

: % of entities with verified beneficial ownership details

Target Value

: ↑ 100%

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8. Applicable Standards, Laws, and Acts

- India: Prevention of Money Laundering Act (PMLA),
- Companies Act 2013
- International: FCPA, UNGC Principle 10,
- OECD Guidelines,
- EU 5th Anti-Money Laundering Directive
- Voluntary Frameworks: GRI 205, ISO 37001,
- Aluminum Stewardship Initiative (ASI)

9. Distribution and Annual Review

SSMI-AD's Anti-Money Laundering (AML) Policy is communicated to all relevant stakeholders through onboarding materials, internal portals, and e-learning modules to ensure continuous awareness. Vendors, contractors, and third-party intermediaries are required to acknowledge the policy in their contracts. This wide distribution reinforces SSMI-AD's commitment to AML compliance and clarifies individual responsibilities. The policy is reviewed annually by the Chief Compliance Officer, incorporating regulatory updates, risk assessment findings, compliance audits, and stakeholder feedback. The review is reported to the Board for strategic guidance. This process ensures the policy remains effective, current, and aligned with best practices across SSMI-AD's global operations.

10. Disciplinary Action for Violators

Violations of this AML Policy will trigger strict disciplinary measures, reinforcing our zero-tolerance stance. Employees or third parties found in breach may face immediate termination of employment or contractual relationship. In serious cases, legal action may be initiated in accordance with applicable Indian and international AML laws. SSMI-AD reserves the right to report suspected violations to regulatory authorities and pursue financial recovery for any losses incurred. These consequences underscore the importance of full compliance with our AML standards and serve as a deterrent against misconduct. Everyone at SSMI-AD is held accountable for maintaining a culture of legal and ethical integrity.

11. Reporting Mechanism

SSMI-AD provides multiple confidential avenues for reporting suspected money laundering. Employees, vendors, and stakeholders may submit anonymous concerns through our secure whistleblower platform. Reports can also be made directly to the Chief Compliance Officer or designated personnel without fear of retaliation. Additionally, external audit channels are available for third-party oversight. All reports are investigated promptly and handled with discretion. The reporting mechanism is central to early detection and response, promoting transparency, accountability, and trust. Training is provided to help employees recognize red flags and understand how to report concerns safely and effectively as part of our broader compliance culture.

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12. Conclusion

At SSMI-AD, we are unwavering in our commitment to preventing money laundering in any form. This policy affirms our pledge to operate with the highest levels of transparency, ethics, and legal compliance. By embedding AML principles across our business processes and relationships, we aim to safeguard the integrity of our operations and uphold the trust of our stakeholders. Our efforts form a vital part of our broader ESG framework, ensuring responsible governance and sustainable business practices. With the support of leadership, employees, and partners, SSMI-AD will continue to strengthen its anti-money laundering measures and protect against financial crime.

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8. Wage Target Disclosure Policy

SSMI-AD/ESG/POLICY-08

1. Purpose

SSMI-AD is committed to paying all direct and contract employees a Living Wage that ensures a decent standard of living, reinforcing our ESG goals of equity and fair labor. We target 100% coverage by March 2027 and will publish annual progress updates to maintain transparency and accountability across all operations.

2. Scope of Application

This policy applies to all direct employees, contract workers, suppliers, and contractors engaged with SSMI-AD. It covers all business functions including manufacturing, logistics, operations, and administrative departments. Geographically, the policy is applicable across all operational sites, offices, and supplier locations managed by SSMI-AD within India.

3. Governance

The ESG Steering Committee, with Board ESG Sub-Committee support, oversees the Living Wage Policy, ensuring strategic alignment and accountability. HR leads implementation with Procurement, Finance, and EHS teams, coordinating audits, budgeting, supplier compliance, and integration with welfare practices to ensure consistent execution across SSMI-AD's operations and supply chain.

4. Definitions

• Living Wage

A living wage is the minimum income necessary for a worker and their family to maintain a decent standard of living. This includes adequate nutrition, safe housing, healthcare, education, transportation, and some discretionary income for unforeseen needs, enabling economic security and human dignity in line with international labor standards.

• ESG (Environmental, Social, and Governance)

ESG refers to the three key factors used to measure the sustainability and ethical impact of a company's operations. It encompasses environmental stewardship, social responsibility including labor practices, and robust governance mechanisms that ensure ethical conduct, compliance, and transparency in business operations and decision-making.

• Stakeholders

Stakeholders are individuals, groups, or organizations that can affect or are affected by SSMI-AD's operations. This includes employees, contract workers, suppliers, customers, local communities, regulators, investors, and civil society.

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Engaging stakeholders ensures inclusive decision-making and fosters trust, accountability, and long-term sustainability in business practices.

5. Roles and Responsibilities

✿ HR Department

The HR Department is responsible for conducting annual wage benchmarking against regional living wage standards, implementing the living wage policy, and collecting employee feedback on wage adequacy and fairness. It ensures continuous improvement, internal communication, and transparency in wage practices across direct and contractual staff within all business units.

✿ Finance Department

The Finance Department manages wage-related budgeting, ensuring resources are allocated to meet living wage targets. It tracks compliance with the policy across departments and monitors financial risks or constraints that may impact implementation. Finance also supports transparent reporting and collaborates with HR to align compensation structures with ESG commitments.

✿ Procurement

The Procurement team ensures all suppliers and contractors align with SSMI-AD's living wage policy. This includes integrating wage compliance clauses into procurement agreements, conducting periodic supplier assessments, and offering support for corrective actions when gaps are identified. Procurement also facilitates capacity-building initiatives for ethical labor practices in the supply chain.

✿ Top Management

Top Management plays a critical governance role by approving the living wage policy and related budget plans. They monitor implementation progress, ensure accountability across departments, and uphold transparency through annual disclosures. Their leadership drives strategic alignment with ESG goals and reinforces a culture of fairness and economic equity at SSMI-AD.

6. Wage Target Disclosure Policy

6.1 Discrimination in Pay

SSMI-AD upholds the principle of equal pay for equal work. Compensation is determined based on role, experience, and performance—regardless of gender, caste, religion, ethnicity, or other personal characteristics. Pay structures are designed to eliminate bias and are regularly reviewed to close any identified wage gaps. HR and top management monitor pay equity and diversity metrics across all departments. Our training programs educate managers and staff about inclusive compensation practices. Through these efforts, SSMI-AD fosters a fair and equitable workplace where all employees feel valued and rewarded for their contributions.

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6.2 Ethical Recruitment Fees

SSMI-AD prohibits the charging of recruitment fees to job seekers by our company, recruiters, or suppliers. All recruitment must be conducted ethically, transparently, and without financial burden on applicants. We work only with approved recruitment agencies that commit to fair hiring practices and comply with international labor guidelines. Contracts with agencies include clauses banning recruitment fees, and periodic compliance checks are conducted. Any reports of fee-related misconduct are investigated immediately, and violations may result in termination of the supplier agreement. This policy protects vulnerable workers from exploitation and indebtedness.

6.3 Grievance Mechanisms

SSMI-AD provides a transparent, accessible, and confidential grievance redressal mechanism for all employees. Complaints related to workplace conditions, human rights violations, or ethical misconduct can be submitted without fear of retaliation. Our multi-channel system includes email, suggestion boxes, grievance officers, and whistleblower hotlines. Each complaint is acknowledged and resolved within a defined timeframe, with regular tracking of resolution effectiveness. Senior leadership reviews grievance trends to inform policy updates. Through this structured approach, we empower employees to voice concerns safely and promote a culture of accountability and continuous improvement.

6.4 Data Privacy Breaches

SSMI-AD recognizes the critical importance of safeguarding stakeholder personal data. We comply with India's Information Technology Act and other relevant privacy regulations. Robust IT infrastructure and protocols are in place to prevent unauthorized access, data leaks, or misuse. Employees are trained on data protection responsibilities, and regular audits are performed to identify system vulnerabilities. Data collected from employees, customers, and suppliers is stored securely and used only for legitimate business purposes. Breaches, if any, are reported transparently and promptly addressed. This commitment strengthens trust and ensures ethical digital practices across all operations.

6.5 Ethical Sourcing

SSMI-AD is dedicated to sourcing raw materials and products ethically and sustainably. We require suppliers to comply with the Aluminium Stewardship Initiative (ASI), GRI 308, and other relevant sourcing standards. Due diligence processes assess human rights, environmental, and labor practices across our supply chains. We prioritize traceability, supplier transparency, and ESG compliance. Contracts include provisions for ethical behavior, and periodic audits are conducted to ensure adherence. Suppliers failing to meet these standards face corrective action or termination. Our ethical sourcing strategy aligns with our values of sustainability, accountability, and responsible growth.

6.6 Accessibility for People with Disabilities

SSMI-AD is committed to creating an inclusive workplace that supports persons with disabilities. We implement fair recruitment practices, ensure accessible facilities, and make reasonable accommodations for employees with disabilities. Job descriptions and selection processes are designed to be non-discriminatory. Awareness training promotes a culture of empathy and respect. SSMI-AD reviews infrastructure and digital systems regularly to improve accessibility. We also collaborate with NGOs and disability experts to enhance inclusive practices. Our goal is to foster an equitable work environment where individuals with disabilities can thrive and contribute meaningfully.

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6.7 Forced Labor

SSMI-AD maintains a zero-tolerance policy for any form of forced, bonded, or involuntary labor. This includes withholding wages, confiscating personal documents, restricting freedom of movement, or coercing workers to perform tasks under duress. We screen all suppliers and contractors for ethical labor practices and require written confirmation of compliance. All workers are employed voluntarily under legally binding contracts that clearly state employment terms. Regular internal and third-party audits are conducted to identify any signs of forced labor. Our commitment ensures that human dignity and freedom are upheld across our operations and supply chains.

6.8 Exploitation of Contract Labor

SSMI-AD is committed to ensuring contract workers are treated with fairness and dignity. Contractual staff must be employed under terms that meet or exceed national labor laws, including provisions for living wages, equal benefits, and safe working conditions. Discrimination between contract and permanent employees in pay, workload, or facilities is prohibited. We engage only with licensed contractors and suppliers who follow ethical employment practices. Contract agreements are regularly reviewed, and audit protocols are enforced to prevent abuse. SSMI-AD supports contract workers with equal access to grievance redressal, workplace training, and well-being initiatives.

6.9 Adequate Compensation / Wage Theft

SSMI-AD upholds fair compensation as a core value. All employees are paid at or above the established living wage benchmark, with timely and accurate disbursement. We strictly prohibit wage theft, unlawful deductions, and delayed payments. Wage structures are transparent, and employees receive detailed pay slips. We collaborate with HR, Finance, and Procurement to ensure compliance across all employment types, including contract labor. Regular audits and grievance mechanisms are used to monitor wage practices. Through this, we protect workers' dignity and promote financial well-being while aligning with international labor standards and national laws.

6.10 Child Labor

SSMI-AD strictly prohibits the employment of children under the age of 18 in any part of our operations, in accordance with Indian labor law and ILO Conventions. This applies to direct hires, contractors, and supply chain partners. All workers undergo age verification during recruitment, and random checks are conducted to ensure ongoing compliance. We promote access to education and support community programs to combat child labor. Our procurement practices prioritize suppliers who demonstrate strong child labor prevention measures. Any violations are addressed immediately through corrective action plans and possible termination of contracts.

6.11 Safe Working Conditions

SSMI-AD prioritizes the health and safety of every employee, contractor, and visitor. We maintain a safe and hygienic workplace in compliance with national EHS (Environment, Health, and Safety) regulations and industry best practices. Regular risk assessments, safety drills, and EHS trainings are conducted to reduce incidents and promote awareness. Personal protective equipment (PPE) and health benefits are provided to all staff. Contractors and suppliers must adhere to our EHS protocols as a condition of engagement. SSMI-AD's safety-first approach aims to prevent accidents, protect lives, and foster a resilient workforce.

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6.12 Transparency in Wages

SSMI-AD promotes wage transparency to ensure employee trust, equity, and engagement. We provide clear wage structures, including components such as base pay, bonuses, deductions, and benefits. Employees receive regular pay slips and can request clarification on any compensation elements. Living wage performance and commitments are publicly disclosed through our sustainability reports and stakeholder communications. This open approach allows for informed dialogue, encourages accountability, and aligns with international frameworks on fair remuneration. Transparency empowers our workforce and reinforces our integrity in compensation practices.

6.13 Harassment and Abuse

SSMI-AD maintains a zero-tolerance stance against any form of physical, verbal, sexual, or psychological harassment and abuse in the workplace. We promote a respectful, inclusive environment through clear policies and regular awareness training, including POSH (Prevention of Sexual Harassment) programs. Employees have access to confidential grievance channels and are protected from retaliation when reporting incidents. All complaints are investigated promptly and thoroughly, with appropriate disciplinary action taken. Managers and supervisors are trained to identify and prevent inappropriate behavior. Our approach reinforces a culture of dignity, trust, and safety for everyone.

6.14 Freedom of Association

At SSMI-AD, we fully support the rights of employees to freely associate, form or join trade unions, and participate in collective bargaining. We comply with ILO Conventions 87 and 98 and ensure non-interference in workers' organizing activities. We recognize the value of labor representation and constructive dialogue for harmonious industrial relations. Management is trained to respect union activities, and employees are protected from discrimination or retaliation related to union participation. We foster a workplace culture where mutual respect and negotiation are encouraged to resolve issues and enhance overall productivity and morale.


6.15 Community Displacement

SSMI-AD is committed to respecting the rights of local communities and ensuring that our operations do not lead to involuntary displacement or disruption. Before starting any new project, we conduct social and environmental impact assessments in consultation with affected stakeholders. We prioritize land rights, cultural preservation, and inclusive dialogue. Grievance mechanisms are made available to communities, and their feedback is incorporated into project planning. Our projects aim to deliver shared value and minimize harm to surrounding populations. Respectful engagement, transparency, and long-term partnerships with communities form the foundation of our approach.

7. ESG Objectives

1. Sustainability Issue	: Discrimination in Pay
Objective	: Ensure equal pay for equal work
Measure	: % of wage parity across similar roles
Target Value	: ↑ 70%

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2. Sustainability Issue

: Ethical Recruitment Fees

Objective

: Eliminate recruitment cost burden on workers

Measure

: % of workers recruited without fees

Target Value

: ↑ 60%

3. Sustainability Issue

: Grievance Mechanisms

Objective

: Provide accessible grievance systems

Measure

: % of workforce covered by grievance platform

Target Value

: ↑ 65%

4. Sustainability Issue

: Data Privacy Breaches

Objective

: Protect employee and stakeholder data

Measure

: # of reported data privacy violations

Target Value

: ↓ 0

5. Sustainability Issue

: Ethical Sourcing

Objective

: Ensure responsible sourcing from suppliers

Measure

: % of suppliers ESG-audited

Target Value

: ↑ 100%

6. Sustainability Issue

: Accessibility for People with Disabilities

Objective

: Make workplace accessible to all

Measure

: % of areas compliant with accessibility standards

Target Value

: ↑ 60%

7. Sustainability Issue

: Forced Labor

Objective

: Eliminate all forms of forced labor

Measure

: # of forced labor cases detected

Target Value

: ↓ 0

8. Sustainability Issue

: Exploitation of Contract Labor

Objective

: Ensure fair treatment of contractual workers

Measure

: % of contract workers covered under fair wage policy

Target Value

: ↑ 90%

9. Sustainability Issue

: Adequate Compensation / Wage Theft

Objective

: Prevent underpayment and wage disputes


Measure

: % of verified timely and full wage disbursements

Target Value

: ↑ 75%

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10.Sustainability Issue

: Child Labor

Objective

: Ensure zero child labor in operations and supply chain

Measure

: # of child labor cases found

Target Value

: ↓ 0

11.Sustainability Issue

: Safe Working Conditions

Objective

: Maintain high safety standards for all workers

Measure

: % of compliance with occupational safety norms

Target Value

: ↑ 100%

12.Sustainability Issue

: Transparency in Wages

Objective

: Disclose wage structures and policies

Measure

: % of roles with publicly available wage brackets

Target Value

: ↑ 75%

13.Sustainability Issue

: Harassment and Abuse

Objective

: Prevent any form of workplace abuse

Measure

: # of harassment or abuse complaints

Target Value

: ↓ 0

14.Sustainability Issue

: Freedom of Association

Objective

: Support employee rights to organize

Measure

: % of employees aware of association rights

Target Value

: ↑ 95%

15.Sustainability Issue

: Community Displacement

Objective

: Prevent negative impact on local communities

Measure

: # of displacement incidents during expansions

Target Value

: ↓ 0

8. Applicable Standards, Laws, and Acts

- SA8000:2014 – Social Accountability Standard.
- UN Global Compact (Principles 1–6).
- Aluminium Stewardship Initiative (ASI) Performance Standard.
- OECD Guidelines for Multinational Enterprises.
- GRI Standards (GRI 202, GRI 401).
- Indian Minimum Wages Act, 1948.
- ILO Conventions No. 95, 131, and 100.
- Code on Wages, 2019 (India).

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9. Distribution and Annual Review

SSMI-AD communicates its Living Wage Policy to all employees, vendors, and contractors to ensure broad awareness and alignment. The policy is accessible via the internal HR portal and published on the corporate website for public transparency. It is introduced during employee induction and reinforced through annual ESG refresher training. Periodic updates and reminders support continued relevance and integration into daily operations and contracts. The ESG Steering Committee conducts an annual review, aligning the policy with updated living wage benchmarks, inflation trends, and labor regulations. In collaboration with HR and Finance, adjustments are approved by top management and shared across the organization.

10. Disciplinary Action for Violators

To uphold the integrity of the Living Wage Policy, SSMI-AD enforces disciplinary actions for violations. Internal employees who fail to adhere to the policy may face progressive disciplinary measures, including formal warnings, suspension, or termination, in line with the HR disciplinary procedure. For suppliers or contractors, violations may lead to blacklisting, financial penalties, or contract termination, depending on the severity and recurrence of non-compliance. These consequences are clearly communicated in contracts and onboarding documentation. Enforcement mechanisms are applied fairly and transparently to ensure accountability across all levels and promote adherence to ethical labor practices within SSMI-AD's ecosystem.

11. Reporting Mechanism

SSMI-AD encourages all employees, suppliers, and other stakeholders to report concerns or grievances related to living wage implementation. Multiple confidential channels are available, including the HR Helpdesk, an anonymous whistleblower hotline, and a dedicated email address: nagaraj@sreesumangala.com. All reports are acknowledged promptly and investigated thoroughly within 14 working days. The investigation process maintains strict confidentiality and ensures protection from retaliation. Outcomes and corrective actions, if required, are documented and shared with relevant parties. This mechanism supports continuous improvement and strengthens trust among stakeholders by ensuring all wage-related concerns are addressed transparently, ethically, and in a timely manner.

12. Conclusion

The Living Wage Policy demonstrates SSMI-AD's strong commitment to ethical labor practices, social justice, and global sustainability standards. By proactively addressing wage fairness, SSMI-AD supports employee well-being, enhances workforce retention, and strengthens stakeholder trust. The policy reflects our broader ESG strategy, where equitable compensation is a cornerstone of responsible business. Through coordinated governance, transparent reporting, and consistent engagement with employees and partners, SSMI-AD aims to create a respectful and dignified work environment. Our long-term vision is to embed economic fairness into every level of our operations, thereby contributing to inclusive growth and positive social impact across the communities we serve.

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9. Learning and Development Policy

SSMI-AD/ESG/POLICY-09

1. Purpose

This policy aims to foster a skilled, motivated, and adaptable workforce by systematically managing employee career stages including recruitment, training, evaluation, and professional development. SSMI-AD commits to bridging skill gaps, promoting occupational safety, enhancing job mobility, and supporting continuous learning to strengthen organizational resilience and employee satisfaction.

2. Scope of Application

This Human Rights and Training Policy applies to all employees, contractors, and stakeholders involved in HR and training functions across SSMI-AD's operations. It covers all business areas including manufacturing sites, administrative offices, and third-party functions throughout SSMI-AD's geographical presence in India, ensuring a unified approach to human rights and development.

3. Governance

Oversight of this policy is provided by the **Human Resources Governance Committee**, led by the Chief Human Resources Officer (CHRO) and supported by Training Managers, Safety Officers, and ESG coordinators. The committee ensures alignment with ESG goals, policy compliance, and resource allocation for career development programs.

4. Definitions

✿ Occupational Skills Development

SSMI-AD promotes continuous occupational skills development by offering structured training programs that enhance technical proficiency, process knowledge, and workplace safety. These initiatives ensure employees remain competent, adaptable, and aligned with evolving industry standards, while also fostering a safer and more efficient working environment.

✿ Career Mobility

SSMI-AD supports career mobility through internal job postings, skill mapping, and succession planning. Employees are encouraged to pursue lateral or vertical movement within the company, aligning personal growth aspirations with organizational needs. This approach helps build a motivated, versatile workforce while reducing turnover and improving engagement.

✿ Performance Evaluation

SSMI-AD conducts regular performance evaluations to measure employee contributions, identify development areas, and set future objectives. The process includes self-assessment, supervisor feedback, and goal tracking, ensuring alignment with business goals and providing a structured path for career development, recognition, and targeted upskilling.

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Functional Redundancy

Functional redundancy occurs when employees are limited to repetitive or narrowly defined tasks without exposure to broader roles or learning opportunities. At SSMI-AD, we actively mitigate redundancy through cross-functional training, job rotation, and personal development plans, promoting engagement, skill diversity, and career progression for all employees.

5. Roles and Responsibilities

Senior Management

Senior Management at SSMI-AD plays a crucial role in championing employee career development by setting strategic direction and allocating adequate resources. They ensure that development programs align with business objectives, promote a learning culture, and support leadership pipelines. Their involvement also reinforces the importance of career progression across all organizational levels.

HR Department

The HR Department is responsible for designing, implementing, and continuously improving programs related to recruitment, training, performance evaluation, and career advancement. They ensure that these programs meet both organizational and employee needs, comply with legal and ESG standards, and foster a supportive environment where individuals can grow their capabilities and fulfill long-term career goals.

Line Managers

Line Managers facilitate employee development by identifying skill gaps, conducting regular performance reviews, and supporting participation in relevant training programs. They play a key role in aligning individual performance with team objectives, mentoring staff, and encouraging growth opportunities. Their direct engagement helps translate strategic goals into actionable development outcomes for their teams.

Employees

Employees are expected to actively participate in their career development by attending training sessions, seeking growth opportunities, and providing feedback on development initiatives. Their commitment to continuous learning and collaboration with managers ensures that they stay competent, adaptable, and aligned with both personal career aspirations and SSMI-AD's evolving operational needs.

Training Coordinators

Training Coordinators organize and oversee all training-related activities at SSMI-AD, including technical, safety, and soft skills development. They maintain training records, ensure compliance with mandatory programs, and evaluate the effectiveness of learning initiatives. Their role ensures employees receive timely, relevant, and impactful training to support both career growth and operational excellence.

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6. Learning and Development Policy

6.1 Functional Role Clutter

SSMI-AD proactively addresses functional redundancy by identifying employees performing tasks with limited business relevance or growth potential. Such employees are supported through targeted upskilling and reskilling programs designed to align their capabilities with current and emerging organizational needs. Redeployment strategies are applied to ensure continued engagement and productivity. This approach minimizes job loss, reduces inefficiencies, and enhances workforce flexibility. It reflects SSMI-AD's ESG-aligned commitment to safeguarding employment while adapting to changing operational landscapes and technological advancements.

6.2 Training Access Inequality

SSMI-AD champions fairness, equity, and inclusion in its recruitment and training practices. The company maintains transparent, merit-based selection and advancement systems that are free from discrimination on the basis of gender, caste, religion, or background. All employees are provided equal access to training and development opportunities. By fostering a diverse and inclusive environment, SSMI-AD cultivates a workforce that reflects the broader society and upholds human rights principles. This inclusive approach ensures every employee has an equal opportunity to succeed and contribute meaningfully to the organization.

6.3 Staff Development Program

SSMI-AD believes in empowering each employee to own their professional journey. Every employee is encouraged to develop an Individual Development Plan (IDP), created collaboratively with their supervisor. The plan outlines career aspirations, skill gaps, short- and long-term goals, and specific development actions. These plans are revisited regularly to track progress and adapt to changing needs. Career coaching, mentorship, and targeted training are integrated to support plan execution. This personalized approach to development increases engagement, prepares employees for future roles, and reinforces SSMI-AD's commitment to retaining and nurturing talent through deliberate and structured growth pathways.

6.4 Sufficient Occupational Safety Training

SSMI-AD considers occupational safety as a top priority and ensures that safety training is embedded in employee development programs. All employees, regardless of job function, undergo mandatory safety training, with specialized modules for roles involving high-risk machinery or environments. Refresher training is provided regularly, and competency assessments are conducted to ensure that safety practices are well understood and applied. This proactive approach reduces workplace incidents and promotes a culture of safety awareness, in line with the company's ESG commitment to worker health, operational risk reduction, and regulatory compliance.

6.5 Learning Level Mismatch

SSMI-AD acknowledges that limited formal education among workers can hinder operational efficiency and safety. To address this, the company implements tailored occupational training programs focused on developing essential technical and safety-related skills.

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These programs are designed to upskill employees and ensure they can perform their roles competently and confidently. By investing in local talent and bridging knowledge gaps, SSMI-AD not only enhances workforce productivity but also contributes to community development. The initiative aligns with the company's ESG commitment to inclusive growth and risk mitigation through capacity building.

6.6 Talent Mobility Strategy

SSMI-AD actively supports internal mobility to foster career advancement, knowledge transfer, and talent retention. Employees are encouraged to explore opportunities across departments, functions, and locations through transparent internal job postings and cross-functional projects. The HR team facilitates mobility through counseling, eligibility mapping, and development support. Managers are expected to identify high-potential talent for new roles and support their transition. Internal mobility is not limited to promotions but includes lateral moves and developmental assignments to broaden experience. This initiative strengthens workforce adaptability, deepens employee engagement, and builds a more resilient organization aligned with business agility and inclusive career growth.

6.7 Training Effectiveness Gap

To maximize return on learning investments, SSMI-AD aligns its training programs with current and projected business requirements. Skill-gap analyses are conducted to tailor training to strategic functions and emerging industry trends. By closely linking employee development with business goals, the company ensures its workforce remains competitive, agile, and innovation-ready. This strategic alignment also improves employee performance, enhances organizational resilience, and contributes to long-term sustainability. SSMI-AD's focus on skill relevance ensures that both individual growth and company objectives are achieved simultaneously.

6.8 Structured Onboarding and Induction

SSMI-AD provides structured onboarding programs to all new employees and contractors to ensure seamless integration into the organization. Induction programs cover corporate culture, ESG principles, safety protocols, company policies, and career development opportunities. Early engagement helps set expectations, boost morale, and reduce time-to-productivity. Refresher induction sessions are also offered periodically to reinforce core values and procedures. This approach ensures that all new team members begin their roles with clarity, confidence, and an understanding of SSMI-AD's commitment to responsible employment practices.

6.9 Performance Review Deficiency

To foster a high-performance culture, SSMI-AD emphasizes the importance of regular performance evaluations and structured feedback. Performance reviews are conducted to assess skills, set clear expectations, and identify development needs. Employees are supported through Individual Development Plans (IDPs), which map training, career aspirations, and support mechanisms. These ongoing evaluations not only help in identifying skill gaps but also enable transparent and merit-based career advancement. Constructive feedback strengthens employee-manager relationships and aligns workforce efforts with organizational objectives, thereby enhancing productivity and long-term employee engagement.

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6.10 Employee Learning Program

SSMI-AD is committed to developing employee competencies through structured and role-relevant skills development training. Training programs are designed to support job efficiency, ensure safe work practices, and foster continuous learning. These include in-person classroom sessions, e-learning modules, on-the-job coaching, and vendor-led training where applicable. Emphasis is placed on industry-specific needs and ESG-aligned operations. Training calendars are reviewed annually, and participation is tracked to ensure equitable access and impact. This initiative not only helps employees advance their careers but also strengthens operational resilience and quality performance in alignment with SSMI-AD's broader growth and sustainability objectives.

6.11 Employee Growth Constraints

SSMI-AD recognizes that lack of career progression opportunities can lead to employee dissatisfaction and turnover. The company is committed to creating structured career paths that enable both horizontal and vertical mobility within the organization. Employees in static or redundant roles will be offered reskilling and redeployment opportunities aligned with evolving business needs. This approach enhances employee morale, retention, and internal talent utilization. Transparent promotion policies and fair assessment systems will be put in place to ensure that all employees have equal access to growth and development within the organization.

6.12 ESG Neglected Careers

SSMI-AD ensures that ESG values such as non-discrimination, human rights, sustainability awareness, and ethical conduct are embedded into its career management and training initiatives. Training modules are designed not only to improve job skills but also to instill a sense of environmental and social responsibility among employees. This integration reinforces the company's commitment to sustainable and inclusive growth while preparing employees to be active participants in responsible business conduct. The ESG alignment also strengthens stakeholder trust and positions SSMI-AD as a forward-thinking organization in its industry.

6.13 Employee Performance Evaluation

At SSMI-AD, regular and objective performance evaluations are integral to employee growth and organizational excellence. Our performance management system includes bi-annual reviews, structured KPI-based assessments, and behavioral evaluations using 360-degree feedback. These reviews help recognize achievements, address gaps, and define development needs in collaboration with employees. Managers are trained to conduct fair and constructive evaluations, fostering transparency and accountability. The process also supports decisions on promotions, career movements, and rewards. Through consistent evaluations, SSMI-AD ensures that employees are aligned with business goals while also encouraging a culture of meritocracy, motivation, and continuous improvement across the company.

6.14 Derutilization of Low-Skilled Workers

SSMI-AD is committed to enabling all employees, including low-skilled workers, to reach their full potential. The company offers foundational training to equip them with additional competencies that allow them to undertake more complex tasks and expand their roles.

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This approach not only improves job satisfaction and employee morale but also enhances organizational agility by creating a more versatile workforce. By reducing redundancy and unlocking hidden potential, SSMI-AD strengthens its operational resilience and contributes to inclusive human capital development as part of its broader ESG goals.

6.15 Development Path Unclear

SSMI-AD ensures that all employees are well-informed about available training programs, promotion pathways, and development resources. Communication strategies include regular announcements via email, intranet updates, posters, and townhall briefings. This helps to create a culture where employees feel supported and motivated to grow. By raising awareness, SSMI-AD drives participation in development initiatives, enhances engagement, and ensures that no employee is left behind due to lack of information. Clear communication of opportunities also reinforces transparency and supports a culture of continuous learning.

6.16 Training Records Deficiency

SSMI-AD recognizes that effective tracking of training and development activities is essential for evaluating impact and maintaining regulatory compliance. The organization maintains comprehensive, digitized records of all employee development programs, performance reviews, and learning outcomes. This data serves as the foundation for internal audits, ESG reporting, and strategic workforce planning. Well-maintained records also enable real-time monitoring, identification of training gaps, and continuous improvement of learning initiatives. Accurate documentation helps the company demonstrate accountability and transparency in its human capital management practices.

6.17 Restricted Contractor Progression

SSMI-AD believes in providing equitable development opportunities to all workers, including those employed on a contractual or temporary basis. The company extends access to training programs and skill enhancement initiatives to this group, ensuring they are not excluded from career growth pathways. By doing so, SSMI-AD fosters an inclusive and respectful work environment, improves workforce capability, and increases the potential for transitioning contractual employees into permanent roles. This initiative reflects SSMI-AD's commitment to social equity, ESG integration, and long-term workforce sustainability.

6.18 Benchmarking Efforts Absent

To maintain competitiveness and drive excellence, SSMI-AD benchmarks its career development practices against peer organizations, industry leaders, and global standards. Benchmarking exercises help identify gaps, adopt innovative solutions, and ensure that the company remains a leader in employee development. The results of these assessments inform policy updates, training improvements, and strategic decisions. Through continuous improvement, SSMI-AD strengthens its human capital, enhances ESG performance, and ensures that its people development strategy remains agile, forward-looking, and impactful.

6.19 Weak Career Mentorship

SSMI-AD acknowledges the pivotal role of line managers in driving employee development and engagement. To build their capacity, the company offers training programs focused on conducting effective performance reviews, mentoring team members, identifying skill gaps, and supporting career progression.


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Managers are equipped with tools and frameworks to hold meaningful development discussions and ensure equitable access to opportunities. This empowerment ensures that career development becomes a shared responsibility and is embedded within day-to-day people management practices, thereby reinforcing the company's commitment to inclusive leadership.

7. ESG Objectives

- Sustainability Issue** : **Functional Role Clutter**
Objective : Streamline roles and responsibilities
Measure : % roles reviewed and realigned
Target Value : ↑ 90%
- Sustainability Issue** : **Training Access Inequality**
Objective : Ensure equal training opportunities for all employees
Measure : % employees with training access
Target Value : ↑ 100%
- Sustainability Issue** : **Staff Development Program**
Objective : Implement structured employee development initiatives
Measure : % participation in development programs
Target Value : ↑ 75%
- Sustainability Issue** : **Sufficient Occupational Safety Training**
Objective : Enhance safety training coverage
Measure : % workforce trained in safety
Target Value : ↑ 100%
- Sustainability Issue** : **Learning Level Mismatch**
Objective : Match training content to employee skill levels
Measure : % training aligned with role levels
Target Value : ↑ 95%
- Sustainability Issue** : **Talent Mobility Strategy**
Objective : Promote internal movement of talent
Measure : % of roles filled through internal mobility
Target Value : ↑ 15%

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7. Sustainability Issue

: Training Effectiveness Gap

Objective

: Assess and improve training outcomes

Measure

: % training sessions rated effective

Target Value

: ↑ 90%

8. Sustainability Issue

: Structured Onboarding and Induction

Objective

: Institutionalize onboarding programs

Measure

: % of new hires onboarded formally

Target Value

: ↑ 75%

9. Sustainability Issue

: Performance Review Deficiency

Objective

: Conduct regular and structured performance reviews

Measure

: % of employees reviewed bi-annually

Target Value

: ↑ 100%

10. Sustainability Issue

: Employee Learning Program

Objective

: Expand continuous learning opportunities

Measure

: No. of learning sessions conducted

Target Value

: ↑ 12

11. Sustainability Issue

: Employee Growth Constraints

Objective

: Enable vertical and lateral growth paths

Measure

: % employees promoted or reassigned

Target Value

: ↑ 15%

12. Sustainability Issue

: ESG Neglected Careers

Objective

: Integrate ESG into career pathways

Measure

: % ESG roles created or supported

Target Value

: ↑ 10%

13. Sustainability Issue

: Employee Performance Evaluation

Objective

: Establish transparent evaluation processes

Measure

: % roles with defined KPIs

Target Value

: ↑ 100%

14. Sustainability Issue

: Derutilization of Low-Skilled Workers

Objective

: Enhance contribution of low-skilled staff


Measure

: % of low-skilled workers upskilled

Target Value

: ↑ 65%

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15.Sustainability Issue

: Development Path Unclear

Objective

: Define structured career development plans

Measure

: % employees with career plans

Target Value

: ↑ 60%

16.Sustainability Issue

: Training Records Deficiency

Objective

: Maintain accurate training documentation

Measure

: % training events documented

Target Value

: ↑ 100%

17.Sustainability Issue

: Restricted Contractor Progression

Objective

: Provide learning opportunities to contractors

Measure

: % of contractors trained

Target Value

: ↑ 80%

18.Sustainability Issue

: Benchmarking Efforts Absent

Objective

: Benchmark training and development practices

Measure

: No. of benchmarks implemented

Target Value

: ↑ 3

19.Sustainability Issue

: Weak Career Mentorship

Objective

: Establish a formal mentorship program

Measure

: % employees assigned mentors

Target Value

: ↑ 60%

8. Applicable Standards, Laws, Acts

- SA8000 – Social Accountability Standard
- Aluminum Stewardship Initiative (ASI) – Human Rights & Labour Practices
- UN Global Compact – Principles on Labour Rights
- OECD Guidelines for Multinational Enterprises – Human Rights and Employment
- Factories Act, 1948 (India)
- Industrial Employment (Standing Orders) Act, 1946 (India)
- The Apprentices Act, 1961 (India)
- Global Reporting Initiative (GRI 404: Training and Education)

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9. Distribution and Annual Review

SSMI-AD ensures transparent dissemination of its Career Management Policy through the company intranet, employee handbooks, onboarding programs, and induction sessions for contractors and suppliers. This multi-channel approach promotes awareness of rights, responsibilities, and career development resources across all levels. The policy undergoes annual review by the Human Resources Governance Committee, incorporating employee feedback, performance data, audit findings, and industry best practices. Updates may include revised progression pathways, new training modules, or adapted evaluation criteria. This continuous improvement ensures the policy remains relevant, supports employee growth, aligns with ESG goals, and fosters a consistent, compliant, and development-focused work environment.

10. Disciplinary Action for Policy Violators

SSMI-AD maintains a zero-tolerance stance against violations of its Career Management Policy. Any actions that hinder fair and equal career opportunities—such as discrimination, favoritism, or denial of mandated training—are addressed through a structured disciplinary framework. Depending on the severity of the infraction, corrective measures may include formal warnings, retraining mandates, temporary suspension, or even termination. The disciplinary process is handled with objectivity, confidentiality, and due process, ensuring accountability across all levels. This policy reinforces the organization's commitment to an ethical, inclusive, and performance-driven environment where employees are treated fairly and empowered to grow professionally.

11. Reporting Mechanism

SSMI-AD encourages open and secure communication regarding any issues, concerns, or suggestions related to career management. Multiple confidential and accessible reporting mechanisms are in place, including anonymous suggestion boxes placed across the facilities, HR grievance redressal channels, a dedicated email address nagaraj@sreesumangala.com, and periodic employee engagement surveys. All reports are treated with seriousness, and follow-ups are conducted in a timely and impartial manner. The company's commitment to transparency and employee voice ensures continuous policy refinement, improved training systems, and trust in the organization's intent to support every employee's professional development and well-being.

12. Conclusion

SSMI-AD firmly believes that structured career management and continuous skill development are fundamental to achieving operational excellence, employee satisfaction, and ESG leadership. Through this policy, we pledge to nurture a workplace that values learning, supports internal mobility, and empowers individuals to realize their full potential. By fostering a resilient, inclusive, and future-ready workforce, SSMI-AD aims to not only enhance business performance but also contribute positively to the communities it operates in. Our long-term success is deeply rooted in our ability to grow our people—ethically, equitably, and sustainably—through every stage of their professional journey.

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10. Water Use Management Policy

SSMI-AD/ESG/POLICY-10

1. Purpose

The purpose of this policy is to establish SSMI-AD's commitment to sustainable water use and protection of water resources through efficient consumption, recycling, pollution prevention, and regulatory compliance. We aim to reduce the environmental footprint of our operations and promote water stewardship across our value chain in line with our ESG principles.

2. Scope of Application

This policy applies to all employees, site managers, contractors, suppliers, and partners involved in SSMI-AD's operations. It covers all industrial activities involving water use, such as furnace cooling, steam generation, chemical processing, and cleaning, across all SSMI-AD facilities located throughout India, including manufacturing, storage, and support sites.

3. Governance

The Water Management Governance Committee, headed by the EHS Head and overseen by the ESG Steering Committee, is responsible for implementing this policy, setting water usage and conservation targets, monitoring compliance, and reviewing performance to ensure alignment with sustainability goals and applicable environmental regulations across all SSMI-AD operations.

4. Definitions

☀ Effluent

Effluent refers to wastewater released from industrial processes, such as cooling, cleaning, or chemical treatments. It may contain contaminants that, if untreated, can harm local ecosystems and public health. Effective treatment and monitoring of effluent are essential to comply with environmental regulations and ensure sustainable water discharge practices.

☀ Water Recycling

Water recycling involves treating used process water to a quality suitable for reuse in industrial operations such as cooling, cleaning, or chemical processes. It helps reduce freshwater demand, lowers discharge volumes, and supports sustainability goals. Implementing recycling systems improves resource efficiency and minimizes the environmental footprint of operations.

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Red Mud

Red Mud is a by-product of the Bayer process during alumina extraction from bauxite. This reddish, highly alkaline slurry contains iron oxides and can pose environmental risks if not properly managed. Safe storage, neutralization, and exploration of reuse options are vital for minimizing ecological and human health impacts.

BAT (Best Available Techniques)

BAT refers to the most advanced and effective methods, practices, or technologies that prevent or reduce environmental impacts from industrial operations. These techniques are economically and technically viable for the specific industry and serve as benchmarks for regulatory compliance, continuous improvement, and sustainable performance.

5. Roles and Responsibilities

Senior Management

Senior Management is responsible for approving the company's water management strategy, setting performance targets, and allocating the necessary financial and operational resources. They ensure that water conservation aligns with business goals and regulatory requirements, fostering a culture of accountability, sustainability, and continual improvement across all departments and operational levels.

EHS Department

The Environment, Health & Safety (EHS) Department conducts regular water audits, tracks consumption and discharge, and ensures the proper functioning of wastewater treatment systems. It evaluates compliance with environmental laws, promotes best practices, and collaborates with other departments to minimize water-related risks and drive sustainable use throughout the facility.

Production Heads

Production Heads are responsible for executing water conservation strategies within their operations. They implement and monitor standard operating procedures (SOPs), install water-efficient technologies, and train staff on minimizing water use. They collaborate with EHS to ensure processes meet sustainability standards and reduce the plant's overall water consumption and effluent generation.

Procurement

The Procurement team sources materials and services from suppliers committed to sustainable water practices. They evaluate vendor compliance with environmental standards, include water-related criteria in contracts, and encourage the use of products and services that promote efficient water use, recycling, and safe disposal, aligning with the company's ESG objectives.

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Employees

All employees are expected to use water responsibly, comply with relevant procedures, and report any leaks, spills, or unsafe water discharge. Through awareness, training, and daily action, employees play a vital role in achieving water conservation goals and supporting the company’s commitment to sustainable and efficient water management.

6. Water Use Management Policy

6.1 Water Footprint Reporting

Transparent reporting of water usage is essential for accountability and ESG performance tracking. SSMI-AD will publish annual water footprint reports aligned with recognized frameworks such as GRI 303 and CDP Water Security. These reports will detail consumption, discharge, treatment, and risk mitigation efforts. Where feasible, external audits will validate disclosures. Stakeholders—including investors, regulators, and communities—will receive relevant updates. Regular reporting helps identify trends, supports regulatory compliance, and communicates SSMI-AD’s commitment to responsible water management across its operations and value chain.

6.2 Maintain Holding Ponds

Poorly maintained holding ponds can lead to seepage, overflow, or contamination of nearby land and water. SSMI-AD will ensure that all holding ponds are regularly inspected, cleaned, and structurally reinforced to prevent leaks. Liner integrity will be monitored, and sediment buildup will be controlled through scheduled desludging. Emergency containment strategies will be prepared for accidental overflows. Maintenance logs and third-party assessments will verify compliance. These actions ensure secure containment of process water, strengthen environmental safeguards, and reduce the risk of regulatory non-compliance.

6.3 Detection and Repair

Leaks in water systems lead to significant losses and environmental degradation. SSMI-AD will implement proactive leak detection and repair programs across all facilities. Water pipelines, tanks, and fittings will undergo weekly inspections, supported by automated monitoring where feasible. Rapid response protocols will ensure that detected leaks are addressed within defined timelines. Maintenance staff will receive specialized training, and records of leak incidents will inform improvement initiatives. This practice not only preserves water but also ensures infrastructure reliability, operational efficiency, and adherence to the company’s water conservation commitments.

6.4 Sustainable Cooling Systems

Recognizing the high water demand of industrial cooling processes, SSMI-AD prioritizes the use of closed-loop, dry, and hybrid cooling systems that significantly reduce or recycle water. These systems are designed to maintain thermal efficiency while conserving water and reducing environmental footprint. New cooling installations are selected based on their water-saving capabilities, and existing legacy systems are periodically evaluated for potential upgrades. By minimizing the volume of fresh water required for temperature regulation, SSMI-AD advances its ESG commitment to water conservation and sustainable industrial practices, supporting long-term resilience in water-scarce regions.

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6.5 Community Impact from Water Use

SSMI-AD recognizes that industrial water use can impact surrounding communities if not managed responsibly. The company will evaluate its water withdrawal in relation to local water availability and ensure that operations do not cause scarcity or conflict. Community consultations will inform water risk assessments, and mitigation measures will be developed collaboratively. SSMI-AD will promote equitable water access, support local water initiatives, and transparently disclose its water use impacts. These efforts strengthen trust with local stakeholders and align with the company's ESG commitments to social and environmental sustainability.

6.6 Water Use Monitoring

Effective water management requires comprehensive monitoring systems. SSMI-AD will install water meters at critical consumption points across all operations to track usage in real-time. This data will feed into digital dashboards for analysis, reporting, and optimization. Facilities will be benchmarked to identify high-consumption areas and opportunities for reduction. Insights will guide process improvements and facilitate transparency in ESG disclosures. Continuous monitoring strengthens accountability, supports informed decision-making, and aligns with regulatory and stakeholder expectations around sustainable water management practices.

6.7 Green Water Harvesting

SSMI-AD has implemented rainwater harvesting systems at key facilities to supplement water requirements and reduce pressure on municipal and groundwater sources. Collected rainwater is stored and utilized for landscaping, floor cleaning, and certain non-contact industrial applications. This initiative not only supports local water balance but also improves the company's water-use efficiency and resilience during dry seasons. The systems are designed in accordance with state-specific water conservation mandates and green building practices. Maintenance and performance checks are conducted routinely to ensure functionality and hygiene of harvested water, reinforcing our sustainability and regulatory compliance efforts.

6.8 Emergency Preparedness

Water-related emergencies such as spills, flooding, or chemical leaks can cause significant damage if not addressed promptly. SSMI-AD will develop and maintain a Water Emergency Response Plan tailored to its operational risks. This plan will include spill containment strategies, communication protocols, and mitigation measures. Periodic drills will train employees and test preparedness. Collaboration with local authorities and emergency services will be encouraged to strengthen resilience. By anticipating and preparing for emergencies, SSMI-AD safeguards communities, ecosystems, and its own operational continuity.

6.9 Water Usage Assessment

SSMI-AD conducts structured water audits to identify areas of inefficiency, water loss, and excessive usage throughout the facility. These audits are carried out by the EHS Department at regular intervals, with a focus on optimizing consumption, preventing waste, and improving operational performance. Insights from audits inform the development of water-saving initiatives, upgrade plans for infrastructure, and the deployment of best practices across departments.

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Audit findings are documented, reviewed by the Water Management Governance Committee, and integrated into sustainability reports. These efforts help drive compliance with ISO standards and strengthen our broader environmental conservation objectives.

6.10 Training on Water Management

Without proper training, employees may inadvertently contribute to water waste, pollution, or regulatory breaches. SSMI-AD will provide comprehensive training on water conservation techniques, spill response, effluent handling, and compliance protocols to all relevant personnel. Training will be tailored to job roles and refreshed annually. Practical exercises and assessments will reinforce learning and competency. By building workforce awareness and capacity, SSMI-AD ensures consistent application of water management practices, enhances operational efficiency, and fosters a culture of environmental responsibility.

6.11 Water Run-off from Process Residue

SSMI-AD will prevent process residue runoff from polluting surrounding areas through effective containment, collection, and treatment measures. Areas exposed to residues such as bauxite will be equipped with runoff diversion structures and capture systems. Collected runoff will be treated prior to discharge or reuse. Site-level water impact assessments will guide mitigation planning, while compliance with runoff SOPs will be strictly enforced. The company will routinely inspect containment systems to avoid overflow or leaks during heavy rainfall. These measures ensure protection of nearby ecosystems and reflect SSMI-AD's proactive environmental management.

6.12 Efficient Cleaning Processes

SSMI-AD optimizes its cleaning, degreasing, and rinsing processes to reduce water consumption while maintaining product quality and safety standards. This is achieved through the use of low-flow spray nozzles, controlled dilution systems, and rinse water recycling mechanisms. By transitioning from traditional high-water-use methods to more efficient alternatives, the company ensures minimal wastage and reduced wastewater generation. These changes align with our zero-discharge goals and support compliance with national water regulations. Continuous employee training and SOP updates ensure that water conservation practices are integrated into daily operational routines across departments.

6.13 Water Regulation Violation

Adhering to legal and voluntary water management standards is vital to SSMI-AD's license to operate. The company will comply fully with national regulations such as CPCB guidelines, BIS norms, and the ISO 14001 framework. International standards including CDP, OECD water guidelines, and Aluminium Stewardship Initiative (ASI) protocols will guide best practices. Internal audits and third-party assessments will ensure compliance and continuous improvement. SSMI-AD's water strategy will align with evolving regulations and stakeholder expectations, reinforcing its role as a responsible corporate citizen.

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6.14 Recycled Water Systems

SSMI-AD is committed to reducing dependency on freshwater sources by implementing technologies that enable water recycling and reuse across its operations. Treated water is reused in non-contact applications such as cooling and cleaning. Closed-loop systems are installed to minimize water discharge and maximize resource efficiency. These practices contribute to sustainable manufacturing while meeting environmental regulatory requirements. SSMI-AD promotes innovation in water reuse through investment in advanced treatment technologies and periodic assessment of system performance. This approach aligns with our ESG goals, promotes resource circularity, and reinforces our commitment to responsible water stewardship across all production units.

6.15 Pollutant Contamination

SSMI-AD is committed to preventing heavy metal contamination in its wastewater. Mercury, cadmium, lead, and similar toxic elements will be closely monitored and removed using advanced treatment systems such as filtration, neutralization, and precipitation technologies. Wastewater discharge will consistently meet national and international quality standards. Testing will be performed regularly, and corrective actions will be taken promptly in case of deviation. By safeguarding aquatic life and human health from toxic pollutants, SSMI-AD demonstrates its commitment to environmental protection and ESG-aligned industrial operations.

6.16 Deburring Effluent Treatment

SSMI-AD has established robust systems for managing wastewater generated during finishing operations such as quenching and deburring. These processes often produce effluents containing oils, chemicals, and fine particulate matter, which are separated using oil-water separators and treated before discharge or reuse. The infrastructure is designed to ensure no untreated water enters municipal drains or natural bodies. Routine monitoring and equipment maintenance help prevent system failures and ensure environmental safety. This policy helps minimize the company's environmental footprint while supporting safe, compliant, and sustainable finishing operations.

6.17 Use of Water-Efficient Technologies

Outdated or inefficient equipment can result in excessive water use and operational inefficiencies. SSMI-AD is dedicated to adopting water-efficient technologies in all applicable processes. This includes retrofitting existing systems with smart valves, low-flow nozzles, and closed-loop recycling lines. Procurement decisions will prioritize efficiency and sustainability. The company will also evaluate emerging technologies that enhance water savings. These upgrades reduce water consumption, lower utility costs, and demonstrate environmental leadership in line with ESG targets and industry best practices.

6.18 Sewage Quality Monitoring

To prevent environmental contamination and ensure compliance with effluent standards, SSMI-AD performs routine wastewater quality assessments. Tests cover critical parameters such as chemical oxygen demand (COD), biological oxygen demand (BOD), total suspended solids (TSS), pH, and heavy metal content. These assessments are conducted pre- and post-treatment, ensuring that all discharged water meets or exceeds regulatory thresholds. Insights from testing are used to refine treatment plant operations and introduce corrective actions when necessary.

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6.19 Improper Storage of Red Mud

SSMI-AD acknowledges the environmental risks posed by red mud and is committed to its secure storage. Red mud will be stored in engineered, reinforced, and monitored impoundments to prevent leachate from reaching the soil or nearby water bodies. pH-neutralization systems will be integrated into storage practices to mitigate alkalinity. Regular inspections, third-party audits, and leak detection systems will ensure structural integrity. The company will follow best practices in red mud management, aligning with regulatory requirements and international ESG expectations. By preventing contamination and minimizing risks, SSMI-AD reinforces its commitment to sustainable operations and ecosystem protection.

6.20 Effluent Discharge without Treatment

Untreated industrial effluents can cause significant harm to ecosystems and communities. SSMI-AD is committed to ensuring that all wastewater is treated to meet or exceed applicable legal standards before discharge. The company will operate advanced in-house effluent treatment plants (ETPs) or engage certified third-party ETPs. Online monitoring systems will provide real-time compliance verification. Staff will be trained in wastewater management, and periodic audits will validate performance. This approach will minimize harmful discharges, protect aquatic environments, and demonstrate SSMI-AD's leadership in responsible water stewardship and environmental compliance.

6.21 Water Impact Analysis

SSMI-AD regularly evaluates its operations for water-related risks using globally recognized water risk assessment tools. These assessments consider factors such as water scarcity, flooding potential, pollution risks, and community water needs. Outcomes are used to develop localized water mitigation plans and prioritize water-efficiency investments in high-risk locations. The process enhances preparedness against environmental shocks and ensures business continuity in water-stressed regions. This risk-based approach supports our strategic planning, regulatory compliance, and commitment to ESG principles, safeguarding both natural ecosystems and operational reliability.


6.22 Excessive Freshwater Consumption

SSMI-AD recognizes the growing strain on global freshwater resources and commits to reducing freshwater dependency across operations. This includes adopting closed-loop water systems, recycling treated water, and using water-efficient technologies in production processes. SSMI-AD will set reduction targets and monitor usage patterns to minimize per-unit water consumption. Regular training, preventive maintenance, and leak reduction initiatives will be prioritized to sustain water conservation. By improving water-use efficiency, the company aims to protect local water supplies, reduce operational costs, and uphold its commitment to responsible environmental stewardship in alignment with ESG goals and national sustainability directives.

6.23 Groundwater Contamination from Leaching

SSMI-AD is committed to protecting groundwater resources from contamination resulting from leaching of industrial materials. All effluent tanks and waste storage units will be double-lined and maintained to prevent seepage. Groundwater quality will be routinely monitored, and emergency response protocols will be activated in the event of any leak detection.

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The company will ensure its infrastructure and practices meet or exceed environmental standards for groundwater protection. Employees will be trained to respond quickly to contamination risks, and operational sites will be designed to minimize impact. Safeguarding groundwater aligns with SSMI-AD's responsibility to surrounding communities and ecosystems.

7. ESG Objectives

- 1. Sustainability Issue** : **Water Footprint Reporting**
Objective : Implement water footprint assessment and disclosure
Measure : % of operations with reported water footprint
Target Value : ↑ 100%
- 2. Sustainability Issue** : **Maintain Holding Ponds**
Objective : Ensure structural integrity and maintenance of holding ponds
Measure : % of ponds inspected and maintained
Target Value : ↑ 100%
- 3. Sustainability Issue** : **Detection and Repair**
Objective : Reduce water loss through early leak detection
Measure : % of leaks repaired within 24 hrs
Target Value : ↑ 95%
- 4. Sustainability Issue** : **Sustainable Cooling Systems**
Objective : Optimize water use in cooling operations
Measure : % reduction in water used per cooling unit
Target Value : ↓ 10%
- 5. Sustainability Issue** : **Community Impact from Water Use**
Objective : Minimize negative water use impacts on local communities
Measure : % community grievances resolved
Target Value : ↑ 95%
- 6. Sustainability Issue** : **Water Use Monitoring**
Objective : Install real-time water metering systems
Measure : % of processes monitored
Target Value : ↑ 100%

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7. Sustainability Issue

: Green Water Harvesting

Objective

: Implement rainwater harvesting infrastructure

Measure

: No. of harvesting systems installed

Target Value

: ↑ 3

8. Sustainability Issue

: Emergency Preparedness

Objective

: Establish water-related emergency response plans

Measure

: % of facilities with water emergency plans

Target Value

: ↑ 100%

9. Sustainability Issue

: Water Usage Assessment

Objective

: Conduct periodic water audits

Measure

: No. of audits completed

Target Value

: ↑ 1/year

10. Sustainability Issue

: Training on Water Management

Objective

: Train employees on sustainable water practices

Measure

: % workforce trained

Target Value

: ↑ 90%

11. Sustainability Issue

: Water Run-off from Process Residue

Objective

: Control and treat water run-off

Measure

: % runoff samples within safe limits

Target Value

: ↑ 70%

12. Sustainability Issue

: Efficient Cleaning Processes

Objective

: Minimize water used in cleaning operations

Measure

: % water saved per cleaning cycle

Target Value

: ↑ 15%

13. Sustainability Issue

: Water Regulation Violation

Objective

: Achieve full compliance with water-related regulations

Measure

: % compliance rate

Target Value

: ↑ 90%

14. Sustainability Issue

: Recycled Water Systems

Objective

: Increase the use of recycled water


Measure

: % of water recycled and reused

Target Value

: ↑ 25%

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15.Sustainability Issue

: Pollutant Contamination

Objective

: Prevent chemical pollutants in water streams

Measure

: % of pollutant-free water samples

Target Value

: ↑ 45%

16.Sustainability Issue

: Deburring Effluent Treatment

Objective

: Improve treatment of effluents from deburring

Measure

: % effluent treated before discharge

Target Value

: ↑ 65%

17.Sustainability Issue

: Use of Water-Efficient Technologies

Objective

: Promote water-efficient technology adoption

Measure

: % of machinery using efficient systems

Target Value

: ↑ 60%

18.Sustainability Issue

: Sewage Quality Monitoring

Objective

: Monitor sewage discharge quality regularly

Measure

: % of samples within permissible limits

Target Value

: ↑ 60%

19.Sustainability Issue

: Improper Storage of Red Mud

Objective

: Prevent water contamination from red mud

Measure

: % red mud sites with secure containment

Target Value

: ↑ 65%

20.Sustainability Issue

: Effluent Discharge without Treatment

Objective

: Eliminate untreated effluent release

Measure

: % of effluent treated before discharge

Target Value

: ↑ 70%

21.Sustainability Issue

: Water Impact Analysis

Objective

: Evaluate environmental impact of water use

Measure

: No. of impact assessments conducted

Target Value

: ↑ 1/year

22.Sustainability Issue

: Excessive Freshwater Consumption

Objective

: Reduce dependency on freshwater sources

Measure

: % reduction in freshwater consumption

Target Value

: ↓ 15%

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23.Sustainability Issue	: Groundwater Contamination from Leaching
Objective	: Prevent groundwater pollution from site operations
Measure	: % borewell samples within safety standards
Target Value	: ↑ 80%

8. Applicable Standards, Laws, Acts

- ISO 14001:2015 – Environmental Management Systems
- Water (Prevention and Control of Pollution) Act, 1974 – India
- Environmental (Protection) Act, 1986 – India
- Aluminum Stewardship Initiative (ASI)
- UN Global Compact – Principle 7
- OECD Guidelines for Multinational Enterprises
- Global Reporting Initiative (GRI 303: Water and Effluents)
- Carbon Disclosure Project (CDP – Water Security)

9. Distribution and Annual Review

SSMI-AD's Water Management Policy is widely communicated to ensure transparency and awareness. It is displayed at all operational sites, included in onboarding materials, and shared with vendors and contractors during engagement processes. The policy is accessible via the intranet and external ESG channels, supported by refresher trainings and EHS sessions to reinforce its application. The ESG Committee reviews the policy annually, considering regulatory changes, operational shifts, stakeholder feedback, and water-related KPIs. Urgent reviews may occur due to compliance or process changes. All updates are communicated promptly, ensuring continued alignment with responsible water use and sustainability goals across operations.

10. Disciplinary Action for Policy Violators

SSMI-AD maintains a zero-tolerance approach toward violations of this water management policy. Any employee, contractor, or vendor found to be in breach of the guidelines may face disciplinary actions, which include verbal or written reprimands, mandatory retraining, or suspension from duties. Severe or repeated violations may result in termination of employment or cancellation of contracts. In cases of deliberate negligence or environmental harm, legal authorities may be notified for further action. These measures reinforce our commitment to regulatory compliance, sustainable practices, and the protection of water resources across all operational activities and stakeholder interactions.

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11. Reporting Mechanism

SSMI-AD encourages proactive reporting of water-related incidents, including leaks, unsafe discharges, or non-compliance. Reports can be submitted confidentially through the internal reporting platform, by emailing nagaraj@sreesumangala.com, or during monthly EHS performance reviews. Employees, contractors, and suppliers are urged to report observations promptly to prevent environmental harm. The EHS team is responsible for investigating all reports, taking corrective actions, and documenting resolutions. Whistleblower protection policies apply to ensure that individuals who report in good faith face no retaliation. This transparent and accessible mechanism fosters a culture of environmental accountability and ensures that water risks are managed swiftly and responsibly.

12. Conclusion

SSMI-AD recognizes that water is a finite and irreplaceable natural resource essential for industrial operations and ecological balance. Through this ESG Water Management Policy, we reaffirm our responsibility to use water wisely, minimize pollution, and engage in continual improvement of our water stewardship practices. This policy guides our commitment to reducing consumption, maximizing recycling, maintaining compliance, and supporting water sustainability across our operations and supply chain. With the participation of all stakeholders, we aim to align our business objectives with global sustainability goals and contribute meaningfully to the preservation of water resources for future generations.

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11. Ecosystem Advocacy Policy

SSMI-AD/ESG/POLICY-11

1. Purpose

This policy establishes SSMI-AD's commitment to environmental services and advocacy by supporting our customers and stakeholders in minimizing their environmental footprint. Our goal is to provide sustainable alternatives, advocate for environmental responsibility, and align with national and international standards, fostering a positive impact on ecosystems and human rights.

2. Scope of Application

This policy applies to all employees, contractors, suppliers, external stakeholders, and business partners across SSMI-AD's operations. It covers manufacturing, supply chain, logistics, and customer engagement activities throughout India, including offices, warehouses, and logistics hubs, as well as all international supply and distribution networks associated with our operations.

3. Governance

The ESG Committee, chaired by the Head of Sustainability and reporting directly to the Managing Director, holds the primary responsibility for implementing, monitoring, and continually improving this policy. The committee ensures alignment with ESG goals, reviews performance metrics, addresses gaps, and drives initiatives that promote sustainability across all operational areas, fostering accountability and continuous improvement.

4. Definition of Terms

✿ Environmental Advocacy

Environmental advocacy involves promoting laws, policies, and practices that protect and enhance natural ecosystems. SSMI-AD actively supports environmental awareness, community participation, and collaboration with government and non-governmental bodies to advance sustainable development, climate resilience, biodiversity protection, and responsible resource use across its operations and supply chains.

✿ External Stakeholder Human Rights

SSMI-AD upholds the rights of external stakeholders by ensuring fair treatment, safety, and access to resources. This includes suppliers, contractors, communities, and customers. The company promotes non-discrimination, decent working conditions, and safe environments while respecting cultural diversity, community well-being, and the principles of international human rights conventions.

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Sustainability Risks

Sustainability risks refer to environmental, social, and economic factors that may negatively impact external stakeholders or compromise long-term value creation. These risks include climate change, pollution, resource scarcity, social inequality, and regulatory non-compliance. SSMI-AD actively identifies, monitors, and mitigates such risks to ensure sustainable, ethical, and responsible business operations.

5. Roles and Responsibilities

ESG Head

The ESG Head is responsible for ensuring that all environmental and stakeholder-related initiatives align strategically with international sustainability standards such as ISO 26000, GRI, and the UN Global Compact. They oversee policy development, performance reviews, and reporting while guiding the organization's ESG roadmap to enhance credibility, transparency, and long-term sustainable impact.

Operations Managers

Operations Managers play a key role in implementing environmental services, including waste management, energy efficiency, and pollution control. They are accountable for integrating ESG principles into daily operations, conducting regular audits, and ensuring compliance with environmental and stakeholder safety protocols across all functions under their control and within their operational territories.

HR Department

The HR Department facilitates awareness and capacity building by conducting training programs on environmental ethics, human rights, and ESG responsibilities. They ensure that employees and contractors are well-informed about relevant laws, company policies, and stakeholder engagement practices. HR also plays a role in handling grievances and promoting a respectful, inclusive workplace culture.

All Employees

All employees are expected to adhere to environmental procedures, respect stakeholder rights, and support continuous improvement initiatives. They must report any violations, hazards, or unethical behavior using established channels. Their proactive involvement in sustainable practices, from energy conservation to ethical engagement, contributes significantly to achieving the company's ESG goals.

6. Ecosystem Advocacy Policy

6.1 Exposure to Hazardous Waste

At SSMI-AD, we prioritize the responsible handling and disposal of hazardous waste to prevent environmental harm and protect external stakeholders. Our operations focus on minimizing hazardous materials use and ensuring safe disposal practices.

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We also collaborate with logistics providers, contractors, and local communities to raise awareness about hazardous waste risks. Through training sessions and strict compliance protocols, we work to ensure that no stakeholder is exposed to harmful by-products from our operations. Our proactive approach includes regular audits and transparent communication to uphold safety standards and foster a culture of health and environmental stewardship.

6.2 Deforestation or Land Use Conflict

SSMI-AD opposes deforestation and unethical land use practices in all its operations and supply chains. We actively avoid sourcing from or operating in areas where land rights are disputed or where ecological harm is likely. Our approach includes supporting afforestation projects, sustainable land management, and community-based land-use planning. We engage stakeholders in dialogue to ensure that land use decisions are made ethically and transparently. By promoting restoration and conservation, we contribute to the protection of biodiversity, community rights, and long-term ecosystem health. SSMI-AD's operations are guided by a no-compromise approach to ethical land stewardship.

6.3 Water Scarcity Impacting Communities

Water is a shared and limited resource. At SSMI-AD, we monitor our water use diligently and implement conservation strategies across all facilities. We aim to avoid operating in water-stressed regions unless robust replenishment plans are in place. SSMI-AD also shares water-saving technologies with local stakeholders and engages in capacity-building programs that promote efficient water use. Our operations are aligned with community water rights and regional sustainability goals, ensuring that our presence does not compromise the water security of neighboring populations. We are committed to long-term water stewardship that protects both operational needs and community well-being.

6.4 Biodiversity Loss

Biodiversity preservation is a core principle at SSMI-AD. We actively ensure that our operations do not encroach upon ecologically sensitive areas or threaten endangered species. Our projects undergo biodiversity assessments, and we partner with conservation organizations to support species protection and habitat restoration. SSMI-AD invests in ecosystem regeneration efforts and promotes biodiversity awareness across its value chain. We believe protecting natural habitats is not just an environmental responsibility but a strategic imperative for long-term sustainability. By aligning our operations with global conservation goals, SSMI-AD contributes meaningfully to preserving life-supporting ecosystems for future generations.

6.5 Energy Poverty in Community

SSMI-AD recognizes that access to clean, reliable energy is essential for social well-being and economic development. We support community-based renewable energy projects, especially in off-grid or energy-poor areas. Our contributions include funding for solar installations, energy efficiency upgrades, and educational workshops to build energy literacy. These efforts align with our broader ESG goals and help bridge the energy access gap for underserved populations. SSMI-AD's approach to energy equity not only supports local development but also advances the global clean energy transition, making sustainability more inclusive and impactful.

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6.6 Environmental Inclusion

SSMI-AD believes that environmental decisions should be inclusive and reflective of stakeholder perspectives. We engage external stakeholders—such as local residents, NGOs, and regulators—through community forums, surveys, and participatory assessments during major project phases. This ensures that concerns are addressed, and solutions are co-created. By fostering open dialogue, we enhance environmental planning, reduce conflicts, and build long-term trust. SSMI-AD's inclusive approach empowers communities and creates a platform where every voice matters, supporting ethical governance and responsible development aligned with shared environmental goals.

6.7 External Exposure Threats

SSMI-AD upholds high standards of health, safety, and environmental (HSE) performance not only within its operations but also among third-party service providers. We provide regular training and support for external workers, including logistics and maintenance teams, to ensure safe working conditions. Our HSE audits cover contractor operations, and we encourage supplier certification to recognized safety standards. SSMI-AD believes that decent work is a universal right and advocates for strong occupational protections across the value chain. By collaborating with partners to improve workplace safety, we create a culture of shared responsibility and risk mitigation.

6.8 Access to Green Alternatives

SSMI-AD is committed to enabling external stakeholders—including customers, partners, and communities—to transition to greener technologies. We offer environmental consulting, eco-design services, and knowledge sharing to encourage the adoption of sustainable practices. Our product development prioritizes low-impact alternatives that align with global climate goals. By integrating environmental education and green technology access into our business model, we empower stakeholders to make informed, eco-friendly choices. This policy fosters innovation, environmental equity, and collaborative growth, allowing SSMI-AD to lead by example in creating a more sustainable and inclusive industrial ecosystem.

6.9 Digenous Rights Violation

SSMI-AD respects the cultural heritage and sovereignty of indigenous communities. We do not engage in operations within indigenous territories without obtaining Free, Prior, and Informed Consent (FPIC). Our business practices uphold international human rights standards and prioritize inclusive development that benefits indigenous populations. SSMI-AD maintains ongoing dialogue with indigenous representatives and actively supports initiatives that preserve their cultural, environmental, and economic interests. We recognize the vital role indigenous knowledge plays in sustainability and are committed to forming partnerships that ensure mutual respect, equity, and environmental stewardship in areas where indigenous rights are at stake.

6.10 Climate Change-Driven Displacement

SSMI-AD recognizes the growing risks posed by climate change, including the displacement of vulnerable populations. We are committed to reducing our carbon footprint by prioritizing low-emission technologies, renewable energy sources, and sustainable practices.

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Beyond our operations, we actively support NGOs and policy initiatives that build climate-resilient communities. We engage in partnerships that raise awareness about environmental migration and advocate for long-term climate adaptation strategies. Through our investments and advocacy, SSMI-AD contributes to a broader effort to protect communities from climate-induced disruptions and enable them to adapt and thrive in a rapidly changing environment.

6.11 Access to Clean Air and Water

SSMI-AD is committed to preserving air and water quality in and around its operational areas. We ensure that our industrial activities do not degrade the environment by adhering to stringent pollution control measures. Our collaboration with local authorities and communities includes sharing regular monitoring reports and promoting clean technologies. We believe clean air and water are fundamental rights and actively support awareness initiatives to educate external stakeholders about their role in preserving natural resources. This commitment strengthens our environmental responsibility and helps build trust with the communities and ecosystems that depend on these vital resources.

6.12 Sufficient Waste Facilities

SSMI-AD acknowledges the strain poor waste management systems can place on communities and ecosystems. We actively support municipalities and partners by promoting circular economy practices and offering guidance on sustainable packaging and waste reduction. By collaborating on joint audits and awareness programs, we aim to improve local waste management capacity and reduce landfill dependency. Our business partners are encouraged to adopt eco-friendly practices, and we promote waste minimization throughout our value chain. Through this proactive engagement, SSMI-AD helps strengthen regional waste infrastructure while minimizing the environmental footprint of our products and services.

6.13 Equitable Environmental Impact

Environmental justice is a key focus for SSMI-AD. We conduct socio-environmental impact assessments to ensure our operations do not disproportionately affect low-income or marginalized communities. Our projects are designed to equitably distribute environmental benefits and avoid placing pollution burdens on vulnerable populations. We invest in cleaner technologies, green infrastructure, and inclusive development initiatives that uplift underprivileged areas. SSMI-AD actively engages communities in decision-making processes and works to prevent environmental discrimination. Through responsible planning and advocacy, we strive to achieve a fairer and more sustainable industrial landscape that benefits all.

6.14 Economic Activity Displacement

SSMI-AD strongly opposes the involuntary resettlement of individuals or communities due to industrial development. We commit to site selection practices that avoid displacement and conduct thorough social impact assessments before initiating new projects. In the rare event where relocation is unavoidable, we ensure transparent consultation, fair compensation, and dignified rehabilitation support for affected parties. Our relocation protocols comply with international human rights frameworks and prioritize stakeholder participation. Through ethical development practices and respect for human dignity, SSMI-AD safeguards community welfare and promotes equitable, sustainable industrial growth.

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6.15 Information of Transparency

Transparency is fundamental to SSMI-AD's environmental and social governance practices. We regularly disclose our ESG performance through accessible reports and engage stakeholders through clear and open communication. Our teams are trained to respond accurately to inquiries and ensure that sustainability data is shared honestly. We also run awareness sessions for customers and suppliers to improve understanding of ESG concepts. By promoting information integrity, SSMI-AD builds credibility, reduces misinformation risks, and empowers stakeholders to make informed decisions. Our culture of openness strengthens accountability and drives continuous improvement across all operations.

7. ESG Objectives

- Sustainability Issue** : **Exposure to Hazardous Waste**
Objective : Minimize public and environmental exposure to hazardous materials
Measure : % hazardous waste securely contained
Target Value : ↑ 90%
- Sustainability Issue** : **Deforestation or Land Use Conflict**
Objective : Prevent ecological disruption from land use
Measure : % projects with ecological impact assessment
Target Value : ↑ 80%
- Sustainability Issue** : **Water Scarcity Impacting Communities**
Objective : Reduce operational strain on local water sources
Measure : % reduction in freshwater withdrawal
Target Value : ↓ 15%
- Sustainability Issue** : **Biodiversity Loss**
Objective : Protect local flora and fauna
Measure : No. of biodiversity conservation actions
Target Value : ↑ 2
- Sustainability Issue** : **Energy Poverty in Community**
Objective : Support clean energy access for nearby communities
Measure : No. of households supported with clean energy
Target Value : ↑ 60
- Sustainability Issue** : **Environmental Inclusion**
Objective : Involve community stakeholders in environmental decisions
Measure : % of projects with community consultation
Target Value : ↑ 75%

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7. Sustainability Issue

: External Exposure Threats

Objective

: Mitigate harmful emissions and pollutants impacting public areas

Measure

: % of ambient air and water samples compliant

Target Value

: ↑ 70%

8. Sustainability Issue

: Access to Green Alternatives

Objective

: Promote sustainable product and service options

Measure

: % increase in green product offerings

Target Value

: ↑ 30%

9. Sustainability Issue

: Digenous Rights Violation

Objective

: Safeguard indigenous environmental rights and land

Measure

: % operations with indigenous impact assessment

Target Value

: ↑ 100%

10. Sustainability Issue

: Climate Change-Driven Displacement

Objective

: Support climate-resilient infrastructure and planning

Measure

: No. of climate adaptation initiatives

Target Value

: ↑ 2

11. Sustainability Issue

: Access to Clean Air and Water

Objective

: Ensure air and water quality for surrounding communities

Measure

: % environmental quality parameters within limits

Target Value

: ↑ 100%

12. Sustainability Issue

: Sufficient Waste Facilities

Objective

: Support access to adequate waste processing infrastructure

Measure

: No. of partnerships with waste service providers

Target Value

: ↑ 3

13. Sustainability Issue

: Equitable Environmental Impact

Objective

: Equitably distribute environmental responsibilities and benefits

Measure

: % reduction in complaints from vulnerable groups

Target Value

: ↓ 15%

14. Sustainability Issue

: Economic Activity Displacement

Objective

: Avoid displacement of local livelihoods due to company operations

Measure

: No. of livelihood restoration programs

Target Value

: ↑ 2

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15. Sustainability Issue

: Information or Lack of Transparency

Objective

: Ensure open and factual environmental communication

Measure

: % of disclosures validated by third-party

Target Value

: ↑ 70%

8. Applicable Standards, Laws, Acts

- ISO 14001: Environmental Management
- Carbon Disclosure Project (CDP)
- UN Global Compact Principles
- OECD Guidelines for Multinational Enterprises
- Global Reporting Initiative (GRI)
- Aluminum Stewardship Initiative (ASI)
- Environment (Protection) Act, 1986 (India)
- Factories Act, 1948 (India)
- Water (Prevention and Control of Pollution) Act, 1974
- Air (Prevention and Control of Pollution) Act, 1981

9. Distribution and Annual Review

SSMI-AD's Environmental Services and External Stakeholder Human Rights Policy is widely disseminated through digital access on the company intranet and included in employee onboarding manuals. ESG awareness sessions educate staff on their responsibilities, while supplier kits and stakeholder communications ensure alignment across the value chain. Policy updates are shared via newsletters, leadership briefings, and sustainability disclosures. Reviewed annually as part of the ESG evaluation cycle—or sooner if prompted by major changes—the policy is assessed by the ESG Committee with departmental input. This process ensures it remains current, effective, and aligned with evolving sustainability standards and stakeholder expectations.

10. Disciplinary Action for Violators

Any violation of this policy will be treated seriously and may result in disciplinary actions proportional to the nature and impact of the breach. Penalties may range from verbal or written warnings to suspension, demotion, or termination of employment or business relationships. In severe cases, especially those involving deliberate environmental harm, human rights violations, or legal non-compliance, SSMI-AD reserves the right to initiate legal proceedings. Disciplinary measures aim to reinforce accountability and uphold the highest standards of conduct across the organization and its value chain, in alignment with our ESG principles and zero-tolerance stance on environmental and social negligence.

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11. Reporting Mechanism

SSMI-AD encourages transparent and proactive reporting of any policy violations, environmental risks, or stakeholder grievances. Reports can be made confidentially through the ESG Reporting Portal, via email to ESG.nagaraj@sreesumangala.com, or by contacting the designated ESG Officer directly. All reports are handled with strict confidentiality and without fear of retaliation. Investigations will be conducted impartially, and appropriate remedial actions will be taken where necessary. The mechanism is designed to empower employees, suppliers, and stakeholders to voice concerns, promote accountability, and ensure prompt resolution of issues in support of environmental integrity and stakeholder rights.

12. Conclusion

SSMI-AD remains steadfast in its mission to drive environmental sustainability and uphold stakeholder human rights across its operations and supply chain. Through the implementation of responsible environmental services, active advocacy for climate-positive policies, and inclusive engagement with external stakeholders, we aim to be a catalyst for positive change. Our holistic approach ensures that environmental protection and human dignity are embedded in every aspect of our business. This policy reflects our long-term vision to be a responsible industrial leader, continually improving our ESG performance while fostering a culture of transparency, integrity, and shared value creation.

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12. Equality and Respect Policy

SSMI-AD/ESG/POLICY-12

1. Purpose

SSMI-AD is committed to fostering a work environment where all employees are treated with dignity and respect, regardless of gender, age, race, caste, religion, disability, sexual orientation, marital status, or any other characteristic protected by law. This policy aims to eliminate all forms of discrimination and harassment and promote equality, inclusion, and workplace safety.

2. Scope of Application

This policy applies to all full-time, part-time, contract, and third-party workers across all business areas, including production, administration, and support functions. It covers all facilities and offices operated by SSMI-AD in India and extends to any future global operations undertaken by the organization.

3. Governance

The policy will be overseen by the Human Resource Department in coordination with the ESG Committee, which includes representatives from leadership, legal, and employee welfare teams. External stakeholders, including auditors, may be consulted for compliance and benchmarking.

4. Definitions

✿ Discrimination

Discrimination refers to any unjust, biased, or prejudicial treatment of individuals or groups based on characteristics such as race, gender, age, religion, disability, or other identity factors. It undermines equality, creates barriers to opportunity, and is strictly prohibited within all operations and practices of SSMI-AD.

✿ Harassment

Harassment includes any unwelcome physical, verbal, or non-verbal behavior that creates an intimidating, hostile, degrading, or offensive work environment. This may involve bullying, threats, inappropriate jokes, or unwanted advances and applies to all workplace interactions, including those involving customers, vendors, and co-workers.

✿ Inclusion

Inclusion is about fostering a workplace where diverse individuals feel respected, valued, and supported. It ensures everyone can contribute fully and thrive regardless of their background, identity, or experience. SSMI-AD promotes inclusive practices through equitable policies, awareness, and active engagement across all levels of the organization.

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5. Roles and Responsibilities

• Management

Management is responsible for enforcing this policy and setting a strong example of respectful, inclusive behavior. They must ensure fairness and transparency in all employment decisions, including hiring, promotions, and disciplinary actions, and create a culture that rejects discrimination and harassment at every level of the organization.

• HR Department

The HR Department leads efforts to prevent discrimination and harassment by conducting training, implementing equitable practices, performing regular salary audits, and addressing grievances promptly. HR is also tasked with leading thorough and impartial investigations into reported incidents and ensuring compliance with legal and organizational standards.

• Supervisors

Supervisors must actively monitor workplace behavior to ensure a respectful and inclusive environment. They play a key role in reinforcing policy adherence, supporting affected employees, and promptly reporting any observed or reported violations to HR for further action, ensuring early intervention and accountability at the ground level.

• Employees

All employees are expected to comply with the anti-discrimination and harassment policy by treating others with dignity and respect. They are encouraged to speak up against any inappropriate conduct, cooperate during investigations, and foster a work environment that values diversity, equity, and mutual respect.

6. Equality and Respect Policy

6.1 Inclusion for Marginalized Communities

SSMI-AD is committed to creating a genuinely inclusive environment that respects individuals of all identities, abilities, and backgrounds. We recognize the challenges faced by marginalized communities and actively work to remove barriers to equal participation. Our initiatives include accessible infrastructure, inclusive hiring practices, and supportive programs like Employee Resource Groups and reasonable accommodations. We promote awareness and sensitivity through workshops and diversity celebrations. Our goal is to make every employee feel welcomed, valued, and empowered to contribute fully to the organization's success. Inclusion is not just a policy—it is a continuous effort to foster equity and mutual respect.

6.2 Diversity Support Groups

SSMI-AD supports the creation and functioning of Employee Resource Groups (ERGs) to promote diversity, peer support, and inclusion across the workplace. These voluntary groups serve as a platform for employees from various backgrounds—including women, LGBTQIA+ individuals, working parents, and persons with disabilities—to connect, share experiences, and foster mutual understanding.

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ERGs are encouraged to host events, training, and advocacy initiatives that align with the company's values. Management recognizes the strategic importance of these groups and allocates resources for their growth. By empowering ERGs, SSMI-AD nurtures a sense of community, amplifies underrepresented voices, and strengthens organizational inclusiveness.

6.3 Harassment and Hostile Work Environment

SSMI-AD adopts a zero-tolerance approach to any form of workplace harassment, including sexual harassment, bullying, verbal abuse, and intimidation. Every employee has the right to work in a respectful and safe environment that fosters dignity and well-being. We invest in preventive measures such as training, awareness sessions, and clear reporting mechanisms. Our Internal Complaints Committee (ICC) ensures that grievances are addressed promptly, confidentially, and impartially. Any substantiated misconduct results in appropriate disciplinary action. By fostering open communication and mutual respect, we aim to eliminate hostility and maintain a supportive culture where every individual feels safe and valued.

6.4 Salary Equity Initiative

SSMI-AD ensures that pay equity is embedded in its compensation philosophy by evaluating roles and salaries regularly to eliminate unjustified pay disparities. All salary decisions are based on objective factors such as qualifications, experience, job responsibilities, and individual performance, and not influenced by gender, caste, religion, or other identity-based attributes. Annual audits help monitor consistency across departments and job levels. Compensation policies and pay bands are made transparent to increase accountability. By ensuring equal pay for equal work, SSMI-AD strengthens trust, boosts morale, and sets a strong example of fairness and equality within the manufacturing sector.

6.5 Efficient Redress Framework

SSMI-AD ensures that employees can report concerns or violations safely, anonymously, and without fear of retaliation. We provide secure channels such as whistleblower hotlines, confidential emails, and online reporting systems, managed independently to maintain privacy. Every complaint is taken seriously and investigated thoroughly, fairly, and promptly. Whistleblowers are protected under a strict non-retaliation policy, and necessary actions are taken based on findings. Regular communication about reporting mechanisms builds employee trust and encourages transparency. Our aim is to empower individuals to speak up, ensure accountability across all levels, and strengthen ethical practices and integrity within the organization.

6.6 Equal Promotion Opportunities

SSMI-AD ensures that all employees have equal access to professional growth opportunities, regardless of their identity or background. Promotion and development decisions are based on documented performance metrics, skill development, and leadership potential. The organization provides mentorship programs, leadership pipelines, and tailored training to ensure underrepresented employees are not overlooked. Promotion panels are trained to evaluate candidates fairly and objectively. Regular reviews of career progression trends help identify and eliminate any disparities. Transparent communication of promotion criteria helps employees understand expectations and fosters trust. This equitable approach reinforces SSMI-AD's commitment to fairness and long-term employee development.

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6.7 Fairness Promotion Measures

SSMI-AD actively cultivates a work culture that respects and promotes equal opportunity for all employees. Initiatives include the adoption of inclusive language in communication, the availability of gender-neutral facilities, and the implementation of flexible working arrangements to support diverse needs. Awareness campaigns, cultural events, and training sessions help build empathy and appreciation for diverse identities. The company also tracks diversity representation across departments to guide future initiatives. SSMI-AD's inclusive practices go beyond legal compliance and aim to embed equity into every aspect of organizational life, ensuring that everyone feels respected, valued, and empowered to succeed.

6.8 Discriminatory Work Environment

SSMI-AD is dedicated to maintaining a workplace free from all forms of discrimination. We uphold the principles of equality and fairness in hiring, promotions, training, compensation, and workplace treatment. Our commitment to diversity is rooted in the belief that it strengthens innovation, collaboration, and company growth. We proactively foster an inclusive environment through awareness programs, fair policies, and continuous monitoring of practices. Employees are encouraged to value each other's backgrounds and identities, while leaders are accountable for eliminating bias in all decisions. Any form of discriminatory behavior is not tolerated and is subject to immediate corrective action.

6.9 Accessible Workplace Programs

SSMI-AD promotes an inclusive workplace where individuals with physical and psychological disabilities are supported and empowered. This includes implementing accessible workplace infrastructure, offering adaptive technologies, and making reasonable accommodations tailored to each individual's needs. Recruitment efforts actively reach out to persons with disabilities, ensuring a fair selection process. Managers receive specialized training on disability etiquette, empathy, and inclusive leadership. Feedback from employees with disabilities is regularly collected to improve inclusion strategies. These efforts reflect the company's dedication to equal opportunity, ensuring that all employees—regardless of ability—can contribute meaningfully and succeed within the organization.

6.10 Equal Hiring Practices

SSMI-AD ensures that recruitment processes are merit-based, transparent, and free from discrimination. Job advertisements are crafted with inclusive language, and selection criteria focus strictly on qualifications, experience, and job-relevant skills. Interview panels are trained to avoid unconscious bias, and all candidate evaluations follow a structured process. Recruitment decisions are documented to maintain accountability and fairness. Special attention is given to ensure underrepresented groups are encouraged to apply and are fairly represented in shortlisting. This approach reflects SSMI-AD's commitment to equal opportunity, ensuring every applicant has a fair and equitable chance to join and thrive within the organization.

6.11 Discrimination Recovery Process

SSMI-AD implements structured and compassionate remediation procedures to support victims of discrimination and harassment. Once a complaint is validated through investigation, an individualized action plan is created in consultation with the affected party.

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Measures may include counseling support, role reassignment, or formal apologies, depending on the nature of the incident. The remediation process also includes monitoring mechanisms to ensure non-recurrence and sustained well-being of the employee. All actions taken are clearly documented and communicated with transparency. These procedures are designed not only to correct wrongdoing but also to restore trust and reinforce the organization's values of fairness and dignity.

6.12 Respectful Workplace Training

At SSMI-AD, employee education is a cornerstone of preventing discrimination and harassment. Regular training sessions are conducted for all employees, including senior leadership, to build awareness of appropriate workplace behavior, legal responsibilities, and how to respond to misconduct. These programs cover real-life scenarios, cultural sensitivity, bystander intervention, and the organization's expectations around mutual respect. Training materials are reviewed and updated annually to remain relevant and engaging. Post-training assessments ensure knowledge retention and program effectiveness. These efforts foster a respectful and inclusive work environment and empower employees to speak up and intervene in situations that contradict company values.

6.13 Gender Pay Inequality

SSMI-AD believes in the fundamental principle of equal pay for equal work. We are committed to ensuring gender pay equity across all departments and roles. Through regular salary audits and compensation benchmarking, we identify and correct unjustified pay disparities. Pay structures are reviewed based on objective criteria like performance, experience, skills, and role requirements, not on gender or identity. Our leadership is accountable for upholding fair compensation practices and ensuring transparency in pay-related decisions. We also raise awareness among managers and HR teams to embed pay equity into our organizational culture, ensuring that equality is both measurable and meaningful.


6.14 Diversity Grievance System

SSMI-AD has established a robust grievance mechanism that allows employees to report discrimination and harassment issues confidentially and without fear of retaliation. The mechanism includes multiple channels, such as designated email addresses, hotlines, and anonymous online platforms. Procedures are explained clearly during onboarding and reinforced through regular communications and awareness sessions. Multilingual support ensures accessibility for all employees. Grievances are handled with sensitivity, speed, and impartiality by trained personnel. The company's non-retaliation policy protects complainants and witnesses. This mechanism not only ensures compliance but also strengthens trust and openness in the organizational culture, encouraging employees to speak up responsibly.

6.15 Respect and Safety

SSMI-AD takes a proactive approach to preventing workplace harassment through the establishment of an active Anti-Harassment Committee and internal monitoring systems. Awareness campaigns, regular workplace culture audits, and safe dialogue forums are held to promote mutual respect and early intervention. Managers and supervisors are trained to detect early warning signs and take prompt action to prevent escalation. Anonymous feedback channels and climate surveys provide additional insight into workplace dynamics. The company ensures that policies are not just reactive but preventive in nature, with a strong emphasis on creating a culture of zero tolerance toward any form of harassment or abuse.


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7. ESG Objectives

- 1. Sustainability Issue** : **Inclusion for Marginalized Communities**
Objective : Promote workplace inclusion for underrepresented groups
Measure : % inclusion initiatives implemented
Target Value : ↑ 90%
- 2. Sustainability Issue** : **Diversity Support Groups**
Objective : Establish employee-led diversity resource groups
Measure : No. of support groups active
Target Value : ↑ 2
- 3. Sustainability Issue** : **Harassment and Hostile Work Environment**
Objective : Eliminate harassment and ensure workplace dignity
Measure : % of harassment cases resolved
Target Value : ↑ 100%
- 4. Sustainability Issue** : **Salary Equity Initiative**
Objective : Ensure fair and equitable compensation across roles
Measure : % of roles assessed for pay parity
Target Value : ↑ 80%
- 5. Sustainability Issue** : **Efficient Redress Framework**
Objective : Strengthen grievance redressal mechanism
Measure : % grievances resolved within timeline
Target Value : ↑ 100%
- 6. Sustainability Issue** : **Equal Promotion Opportunities**
Objective : Ensure promotion access is based on merit
Measure : % of promotions reviewed for fairness
Target Value : ↑ 100%
- 7. Sustainability Issue** : **Fairness Promotion Measures**
Objective : Integrate equity into performance evaluations
Measure : % departments applying fairness indicators
Target Value : ↑ 90%

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8. Sustainability Issue

: Discriminatory Work Environment

Objective

: Detect and eliminate workplace discrimination

Measure

: % employees trained on anti-discrimination

Target Value

: ↑ 100%

9. Sustainability Issue

: Accessible Workplace Programs

Objective

: Provide inclusive access to all facilities and programs

Measure

: % of accessibility-compliant infrastructure

Target Value

: ↑ 100%

10.Sustainability Issue

: Equal Hiring Practices

Objective

: Ensure unbiased recruitment and selection

Measure

: % hiring panels trained in DEI

Target Value

: ↑ 100%

11.Sustainability Issue

: Discrimination Recovery Process

Objective

: Support affected individuals with recovery mechanisms

Measure

: % of affected employees receiving support

Target Value

: ↑ 100%

12.Sustainability Issue

: Respectful Workplace Training

Objective

: Foster a culture of mutual respect

Measure

: % employees completing training

Target Value

: ↑ 100%

13.Sustainability Issue

: Gender Pay Inequality

Objective

: Eliminate gender-based pay gaps

Measure

: % of gender pay gap closed

Target Value

: ↑ 100%

14.Sustainability Issue

: Diversity Grievance System

Objective

: Enable confidential reporting of discrimination cases

Measure

: % system utilization rate

Target Value

: ↑ 60%

15.Sustainability Issue

: Respect and Safety

Objective

: Promote a workplace free from intimidation and harm

Measure

: % employee satisfaction on safety and respect

Target Value

: ↑ 85%

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8. Applicable Standards, Laws, and Acts

- Equal Remuneration Act,
- POSH Act (Prevention of Sexual Harassment),
- Constitution of India – Article 15.
- SA8000:2014
- UN Global Compact (Principles 1, 6)
- OECD Guidelines for Multinational Enterprises
- Global Reporting Initiative (GRI 405: Diversity and Equal Opportunity)
- Aluminum Stewardship Initiative
- ILO Conventions 100 (Equal Remuneration) & 111 (Discrimination)

9. Distribution and Annual Review

SSMI-AD ensures widespread awareness and compliance with its Anti-Discrimination and Harassment Policy through multi-channel distribution. The policy is included in employee handbooks, introduced during onboarding, and accessible via internal digital portals. Printed copies are displayed on notice boards and in key areas across all locations. Regular discussions during town halls and awareness workshops reinforce its significance and clarify expectations. Reviewed annually by HR and the ESG Committee, the policy is updated based on legal changes, employee feedback, audits, and best practices. This ensures it remains relevant, effective, and aligned with SSMI-AD's commitment to a respectful, inclusive, and safe workplace.

10. Disciplinary Action for Violators

Any violation of the anti-discrimination and harassment policy will be treated with utmost seriousness. Disciplinary actions will be proportionate to the nature and severity of the offense. Possible consequences include verbal or written warnings for minor infractions, suspension for repeated or serious misconduct, termination of employment for severe violations, and legal action when applicable under prevailing laws. Disciplinary decisions will be made following a fair investigation process, ensuring all parties are heard and evidence is reviewed. The goal is to enforce accountability while upholding the dignity of all employees and reinforcing the organization's commitment to an ethical and respectful workplace.

11. Reporting Mechanism

SSMI-AD provides multiple safe and accessible channels for reporting discrimination or harassment. Employees may approach the Internal Grievance Committee, which also ensures compliance with the Prevention of Sexual Harassment (POSH) Act. A confidential whistleblower hotline and dedicated email address are available for secure and discreet reporting.

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An anonymous online reporting system further supports those hesitant to identify themselves. All reports will be investigated promptly, fairly, and confidentially, with appropriate action taken. The company guarantees protection from retaliation for anyone raising genuine concerns in good faith, ensuring a culture where all employees feel empowered to speak up against misconduct.

12. Conclusion

SSMI-AD's Discrimination and Harassment Policy underscores our commitment to a fair, respectful, and inclusive workplace. We align with global human rights principles and local laws to protect our workforce and enhance productivity and morale. Through continuous monitoring, training, and engagement, we aim to be a role model in ethical manufacturing practices and inclusive growth.

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13. Victim Support Process Policy

SSMI-AD/ESG/POLICY-13

1. Purpose

The purpose of this policy is to establish a fair, transparent, and accessible remediation procedure for victims of discrimination and harassment at SSMI-AD. It aims to ensure timely, corrective, and restorative actions that promote justice, accountability, and trust, in alignment with SSMI-AD's ESG values and commitment to upholding fundamental human rights across all operations and stakeholder interactions.

2. Scope of Application

This policy applies to all SSMI-AD employees, contract workers, interns, apprentices, vendors, and external stakeholders. It covers all business areas including manufacturing, HR, supply chain, procurement, warehousing, and support services. The geographical scope includes all SSMI-AD operations within India and extends to international subsidiaries wherever applicable.

3. Governance

The Grievance Redressal Committee (GRC), in collaboration with the ESG Governance Team, oversees the implementation of all remediation actions. They ensure a non-retaliatory and fair process, monitor the effectiveness of remedial steps taken, and regularly report outcomes and trends to senior leadership for continuous improvement and accountability across all operations.

4. Definition of Terms

✿ Discrimination

Discrimination refers to any unjust or unequal treatment of individuals based on characteristics such as gender, caste, religion, disability, age, race, or sexual orientation. It manifests in hiring, promotion, pay, task assignments, or workplace behavior, and undermines equal opportunity, dignity, and fairness, violating SSMI-AD's commitment to inclusion and human rights.

✿ Harassment

Harassment includes any unwelcome conduct—verbal, physical, psychological, or sexual—that offends, humiliates, or intimidates a person or group, creating a hostile work environment. It may involve repeated behavior or a single serious incident and can occur between peers, across hierarchies, or from third parties, violating the right to safety and respect.

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✿ Remediation

Remediation is the process of providing fair and effective redress for victims of discrimination or harassment. It includes corrective, compensatory, and preventive measures to restore the victim's dignity, prevent recurrence, and rebuild trust. SSMI-AD ensures that remediation is timely, transparent, survivor-centric, and aligned with human rights and ESG standards.

✿ Proportionality

Proportionality ensures that the consequences of policy violations are aligned with the severity of the misconduct. It prevents under- or over-punishment by applying fair, measured sanctions based on the impact of the harm. This principle fosters accountability and maintains trust in SSMI-AD's grievance redressal and disciplinary mechanisms.

✿ Monitoring

Monitoring involves tracking the implementation and outcomes of remediation measures to verify effectiveness. It ensures that the victim's well-being is restored and similar incidents do not recur. SSMI-AD conducts regular reviews, gathers feedback, and reports data to improve grievance resolution, uphold justice, and maintain ESG compliance and transparency.

5. Roles and Responsibilities

✿ Employees and Stakeholders

All employees, contract workers, and external stakeholders are expected to report incidents of discrimination or harassment in good faith. They must cooperate fully in the investigation and resolution process. Protection from retaliation is guaranteed, and their active participation is essential to ensure a fair, transparent, and effective remediation process.

✿ Supervisors/Managers

Supervisors and managers are responsible for supporting affected individuals, escalating concerns to HR or the Grievance Redressal Committee without delay, and maintaining confidentiality. They must create a safe environment for disclosure, prevent retaliation, and lead by example in enforcing SSMI-AD's zero-tolerance approach toward discrimination, harassment, and other human rights violations.

✿ HR Department

The HR Department leads the implementation of corrective actions, including role restoration, psychological support, and preventive training. It coordinates with the Grievance Redressal Committee, maintains confidentiality, documents all cases, and ensures that policies are enforced consistently. HR also facilitates survivor-centred counselling and monitors the long-term effectiveness of remedial measures.

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Grievance Redressal Committee

The Grievance Redressal Committee (GRC) investigates complaints fairly, confidentially, and impartially. It determines appropriate remedies based on facts and proportionality. The GRC ensures timely closure, recommends preventive actions, and submits reports to senior leadership. Its decisions are grounded in SSMI-AD's ethical values, ESG commitments, and legal obligations under Indian law.

Top Management

SSMI-AD's top management ensures the policy is effectively implemented by allocating necessary resources, endorsing GRC recommendations, and promoting a culture of non-discrimination. They uphold the integrity of the remediation process by avoiding interference and ensuring accountability at all levels, thus reinforcing trust in the organisation's grievance and human rights systems.

6. Victim Support Process Policy

6.1 Response Transparency Failures

SSMI-AD believes that trust is built not only by preventing harm but also by responding to it openly. In the event of serious violations, the company provides anonymized, transparent reports to stakeholders about the nature of the grievance, the steps taken, and the outcome of remediation. While protecting victim confidentiality, the company shares relevant data that demonstrate accountability. These communications are shared with internal teams, regulators, and community stakeholders. By doing so, SSMI-AD promotes a culture of integrity and public responsibility, reassuring all stakeholders that the organization upholds justice and fairness in both letter and spirit of its policies.

6.2 Addressed Harm Claims

SSMI-AD is committed to providing fair compensation in instances where victims of workplace violations suffer financial or emotional harm. This may include loss of income, medical costs, psychological trauma, or disruption to career progress. Compensation is calculated based on legal provisions, industry standards, and the specific impact on the individual. The process is transparent and consultative, ensuring victims understand their rights. Compensation is viewed not merely as a financial gesture, but as a vital step in justice and healing. SSMI-AD believes such reparations restore trust, reaffirm dignity, and reinforce the organization's accountability in addressing harm and restoring equity.

6.3 Remediation Delays

SSMI-AD recognizes that delays in remediation can prolong victim suffering and undermine the effectiveness of justice. Therefore, all remediation actions—such as reinstatement, counselling, compensation, or disciplinary action—are initiated within a defined timeframe of 30 days post-investigation closure, unless legally constrained. Internal dashboards track case timelines, and escalation procedures are in place to address bottlenecks. Victims are kept informed at every step to reduce anxiety and uncertainty. Timely resolution is a key pillar of trust in the grievance system. SSMI-AD is committed to resolving cases efficiently while maintaining thoroughness, transparency, and fairness throughout the process of redressal.

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6.4 Community Justice Denied

SSMI-AD extends its commitment to justice and inclusivity beyond the workplace to surrounding communities. If discrimination, exclusion, or environmental injustice impacts local populations, the company engages in proactive remediation through open dialogue, mediation, and partnership with local leaders. Grievances may relate to hiring practices, environmental pollution, or cultural insensitivity. SSMI-AD ensures all such issues are investigated and addressed respectfully and transparently. These engagements are seen not as obligations, but as part of the company's social license to operate. Ensuring dignity and fairness to community members strengthens stakeholder relations and aligns the organization with broader human rights and ESG principles.

6.5 Participation Barriers Noted

Victim participation is essential for successful and meaningful remediation. SSMI-AD ensures that all victims are consulted on possible remedies before implementation. Options are discussed in private, and the victim's preferences are recorded and respected. This approach not only empowers the victim but also leads to more effective outcomes. Whether it's returning to a specific department, receiving counselling, or demanding a formal apology, each case is treated individually. Remedy design becomes a collaborative and consensual process. This inclusive approach helps prevent secondary trauma and ensures that the remediation aligns with the victim's emotional, professional, and cultural needs.

6.6 Formal Space Violations

SSMI-AD ensures that all workers—including outsourced, contractual, cleaning, or transport staff—are fully protected under its anti-harassment and discrimination policies. Informal workspaces often carry a higher risk of unreported violations due to lack of awareness or power imbalance. SSMI-AD conducts periodic sensitization and grievance awareness training for informal workers, translated into vernacular languages where needed. Special grievance channels are available, and complaints are handled with the same seriousness as those from core staff. By extending its protections to every individual working under its influence, SSMI-AD affirms that respect and dignity at work are universal, not role-specific or hierarchical.

6.7 Repeated Offender Management

To maintain a safe and respectful workplace, SSMI-AD closely monitors employees involved in repeated complaints of misconduct. If a pattern of behavior is identified, the concerned individual is flagged for additional scrutiny and may be subjected to progressive disciplinary actions including mandatory training, formal warnings, suspension, or termination. The HR department works with the Grievance Redressal Committee to ensure due process is followed while also protecting the workplace from further harm. Repeat offenders jeopardize organizational culture, and SSMI-AD takes proactive measures to reform or remove such individuals, thus upholding safety and reinforcing zero-tolerance for any form of misconduct.

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6.8 Adequate Mental Health Support

SSMI-AD recognizes that the psychological impact of workplace harassment or discrimination can be severe and long-lasting. The company provides professional psychological counselling to victims at no cost, ensuring that emotional recovery is addressed with care. Employees are also granted medical leave, flexible working options, or reduced duties during the healing process. Managers are trained to provide psychological first aid and to respect confidentiality. Mental health support is not just limited to the time of the incident but extends into reintegration phases. SSMI-AD promotes mental wellness as a core element of recovery and employee dignity in its grievance redressal system.

6.9 Retaliation Post-Complaint

SSMI-AD strictly prohibits any form of retaliation against individuals who raise concerns or file complaints. Retaliation may include threats, social exclusion, demotion, negative appraisals, or job loss. Any such acts are investigated as serious violations of ethical conduct and are subject to disciplinary action. Supervisors and colleagues are educated to maintain a neutral and supportive stance toward complainants and witnesses. The organization has a non-retaliation guarantee in place, and victims are monitored for any post-complaint discrimination. Anonymous feedback and whistleblower channels help detect signs of retaliation. SSMI-AD's top priority is to build a culture of safe reporting and transparent redressal.

6.10 Cultural Insensitivity in Remediation

At SSMI-AD, remediation efforts are sensitive to the cultural, social, and gender backgrounds of victims. The company understands that emotional healing requires empathy, not a one-size-fits-all solution. Therefore, investigations and remedy processes involve a diverse team, including female and culturally aware staff when needed. Communication is adapted to the victim's language preferences, and cultural norms are respected throughout. Remedies are crafted with input from the victim and handled with dignity and discretion. This sensitivity ensures victims feel heard and protected in a manner aligned with their personal and cultural identity, resulting in more effective and humane redressal processes.

6.11 Third-party Harassment

SSMI-AD's harassment policy extends beyond internal employees to include any misconduct by suppliers, contractors, visitors, or other third parties. The company believes that every individual interacting with its workplace deserves protection. Victims of third-party harassment are entitled to the same remedies and support as those affected by internal actors. Incident reporting channels are open to all affected employees, and suppliers are contractually bound to follow ethical codes of conduct. Where violations occur, the third party may be penalized, blacklisted, or removed from engagement. This approach ensures holistic safety and reinforces the principle of zero tolerance across all interactions.

6.12 Follow-up After Remedy

SSMI-AD understands that remedy implementation is not the end of the grievance process. Follow-ups are scheduled at regular intervals after resolution to ensure that victims are safe, supported, and satisfied. Feedback is gathered to assess whether the remedy was effective or requires adjustments. Additional support, such as counselling or mentorship, may be offered if needed.

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This phased follow-up reinforces the organization’s commitment to long-term recovery and employee well-being. It also helps build trust in the grievance redressal process. SSMI-AD views every resolved case as an opportunity to learn and continuously improve its approach to workplace dignity and justice.

6.13 Sufficient Communication with Victims

Effective communication with victims is central to SSMI-AD’s grievance resolution process. Victims are engaged throughout the process—from investigation to remedy design—to ensure their voices are heard and their preferences respected. Dedicated case handlers maintain confidential, regular communication and update the victim on progress. Remedies are implemented only after obtaining informed consent. The tone, language, and method of communication are tailored to the victim’s comfort level. Feedback is gathered after resolution to assess satisfaction and suggest improvements. By prioritizing clear, compassionate, and confidential dialogue, SSMI-AD fosters a victim-centric approach that enhances trust, empowerment, and psychological safety.

6.14 Restorative Action Lacking

At SSMI-AD, any employee who reports misconduct is guaranteed protection from adverse employment consequences. Victims of workplace harassment or discrimination will not face demotion, transfer without consent, or termination. Instead, based on their preferences, victims may either be reinstated to their original positions or offered alternative roles in alignment with their skills and comfort. These rights are clearly communicated during and after investigation. Reinstatement decisions are based on dialogue with the victim, with consideration to their emotional recovery and workplace integration. The organization is committed to preventing secondary trauma through unjust treatment and unfair employment consequences post-resolution.


6.15 Addressed Workplace Harassment

SSMI-AD enforces a strict zero-tolerance policy against any form of workplace harassment, whether verbal, physical, psychological, or sexual. All reported cases are treated with utmost seriousness, confidentiality, and urgency. Victims receive full support, including medical care, counselling, and legal assistance. Internal systems ensure timely investigation and remediation. Employees are educated on respectful behavior, and managers are trained to intervene proactively. Harassment cases are documented and tracked to prevent recurrence. The organization prioritizes a culture of respect, safety, and inclusiveness, ensuring that all employees—irrespective of role or status—can work in a secure and harassment-free environment with guaranteed dignity and fairness.

7. ESG Objectives

1. Sustainability Issue	: Response Transparency Failures
Objective	: Ensure clarity and openness in remediation actions
Measure	: % of cases with documented response summaries shared with victims
Target Value	: ↑ 70%

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2. Sustainability Issue

: Addressed Harm Claims

Objective

: Address all verified claims effectively

Measure

: % of harm claims resolved within 30 days

Target Value

: ↑ 65%

3. Sustainability Issue

: Remediation Delays

Objective

: Reduce time taken for redressal

Measure

: Average days to complete remediation

Target Value

: ↓ 5

4. Sustainability Issue

: Community Justice Denied

Objective

: Ensure timely response to community grievances

Measure

: % of community complaints resolved

Target Value

: ↑ 95%

5. Sustainability Issue

: Participation Barriers Noted

Objective

: Enable victim involvement in the remedy process

Measure

: % of victims consulted in remediation decisions

Target Value

: ↑ 80%

6. Sustainability Issue

: Formal Space Violations

Objective

: Address harm occurring outside formal workplaces

Measure

: % of informal incidents investigated

Target Value

: ↑ 85%

7. Sustainability Issue

: Repeated Offender Management

Objective

: Take corrective action against recurring offenders

Measure

: % of repeat offense cases with disciplinary action

Target Value

: ↑ 80%

8. Sustainability Issue

: Adequate Mental Health Support

Objective

: Provide counseling and support for victims

Measure

: % of victims offered mental health services

Target Value

: ↑ 70%

9. Sustainability Issue

: Retaliation Post-Complaint

Objective

: Prevent backlash against complainants


Measure

: # of retaliation cases post-remedy

Target Value

: ↓ 0

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10.Sustainability Issue

: Cultural Insensitivity in Remediation

Objective

: Respect cultural values in redressal processes

Measure

: % of remedies reviewed for cultural relevance

Target Value

: ↑ 65%

11.Sustainability Issue

: Third-party Harassment

Objective

: Address harassment by external parties

Measure

: % of third-party complaints investigated

Target Value

: ↑ 60%

12.Sustainability Issue

: Follow-up After Remedy

Objective

: Ensure effectiveness of remediation outcomes

Measure

: % of cases with documented follow-up

Target Value

: ↑ 65%

13.Sustainability Issue

: Sufficient Communication with Victims

Objective

: Maintain clear and regular communication

Measure

: % of victims updated at each stage

Target Value

: ↑ 75%

14.Sustainability Issue

: Restorative Action Lacking

Objective

: Implement fair and restorative justice approaches

Measure

: % of cases with restorative elements included

Target Value

: ↑ 80%

15.Sustainability Issue

: Addressed Workplace Harassment

Objective

: Ensure all harassment complaints receive full action

Measure

: % of harassment cases resolved with corrective action

Target Value

: ↑ 85%

8. Applicable Standards, Laws, and Acts

- Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
- Indian Penal Code (Sections related to assault, intimidation)
- Equal Remuneration Act, 1976
- SA8000: Freedom from discrimination and abuse
- UN Global Compact: Principles 1, 6
- OECD Guidelines: Operational-level grievance mechanisms
- GRI 406: Remediation measures in discrimination incidents
- Aluminum Stewardship Initiative (ASI): Principle on grievance and remediation

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9. Distribution and Annual Review

SSMI-AD ensures broad dissemination of its Discrimination and Harassment Policy through multiple channels to promote awareness and inclusivity. The policy is introduced during employee onboarding, displayed on workplace notice boards, and uploaded to the intranet for easy access. Vendors, suppliers, and contractors receive the policy as part of ethical sourcing standards. To ensure accessibility, it is translated into local languages and available in formats suitable for persons with disabilities. The policy is reviewed annually by the ESG Committee and HR Department, or earlier if needed, based on legal updates, audits, or stakeholder feedback. This process supports continuous improvement and reinforces SSMI-AD's ESG and human rights commitments.

10. Disciplinary Action for Violators

Violations of this policy result in appropriate disciplinary action based on the nature and severity of the offense. Penalties may include formal written warnings, temporary suspension, demotion, or termination of employment. Legal prosecution may be pursued where applicable under Indian law. For external parties such as vendors or contractors, breaches may result in contract termination or permanent delisting. These consequences ensure accountability and serve as a deterrent to discriminatory or harassing behavior. SSMI-AD applies a proportionality principle to all disciplinary actions, reaffirming our zero-tolerance stance and commitment to fostering a safe and respectful workplace.

11. Reporting Mechanism

SSMI-AD provides multiple secure channels for employees and stakeholders to report grievances, including dedicated email IDs, web-based portals, physical suggestion boxes, and helplines. Reports can be made anonymously and are handled with strict confidentiality. Sensitive cases are reviewed by an independent oversight body to ensure impartiality. Victims are regularly updated on the progress and outcomes of their complaints, building trust and transparency. All complaints are documented, investigated, and resolved in a timely manner. These mechanisms empower individuals to speak up without fear of retaliation and are integral to our human rights protection and ESG compliance strategy.

12. Conclusion

SSMI-AD is committed to restorative justice and upholding the dignity of all individuals affected by discrimination or harassment. This policy establishes clear procedures to ensure harm is acknowledged, addressed, and corrected through proportionate, transparent, and monitored action. We believe that a strong remediation process reinforces our ESG commitments, enhances organizational integrity, and supports a respectful work environment. By embedding these principles across operations and holding all stakeholders accountable, SSMI-AD aims to build a workplace culture rooted in fairness, inclusion, and human rights. Our continued vigilance and dedication to improvement reflect the values that drive our sustainable business practices.

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14. Stakeholder Reporting Mechanism Policy

SSMI-AD/ESG/POLICY-14

1. Purpose

SSMI-AD commits to a zero-tolerance approach toward corruption and bribery by providing a safe, confidential, and accessible whistleblower mechanism. This enables employees, suppliers, customers, and other stakeholders to report concerns without fear of retaliation, ensuring transparency, accountability, and compliance with applicable laws and ESG principles.

2. Scope of Application

This policy applies to all SSMI-AD employees (permanent, contractual, and temporary), suppliers, vendors, contractors, business partners, customers, and third parties. It covers all functional areas, including manufacturing, procurement, sales, finance, and administration, across all SSMI-AD operations in India and any international partnerships or engagements.

3. Governance

The Board of Directors oversees the implementation of the whistleblower policy. The Compliance & Ethics Committee manages investigations and ensures follow-up actions. The Whistleblower/Compliance Officer handles report intake, maintains confidentiality, and enforces non-retaliation. Departmental heads assist in investigations and support appropriate corrective and preventive actions.

4. Definition of Terms

☀ Whistleblower

A whistleblower is any individual, including employees, vendors, or third parties, who reports suspected corruption, bribery, or unethical behavior. Reports must be made in good faith and can be submitted anonymously. Whistleblowers are protected from retaliation and are encouraged to speak up to uphold SSMI-AD's ethical standards.

☀ Retaliation

Retaliation refers to any negative or punitive action taken against a whistleblower as a result of reporting misconduct. This includes termination, demotion, harassment, or any other form of discrimination. SSMI-AD strictly prohibits retaliation and ensures protective measures are in place to uphold the whistleblower's rights and safety.

☀ Corruption and Bribery

Corruption and bribery involve offering, giving, receiving, or soliciting anything of value to improperly influence decisions or gain unfair business advantages. This includes cash, gifts, favors, or kickbacks.

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SSMI-AD adopts a zero-tolerance approach and promotes transparent, ethical conduct in all business transactions, internally and with external stakeholders.

5. Roles and Responsibilities

✿ Board of Directors

The Board of Directors provides strategic oversight of the whistleblower program. It approves the whistleblower policy, ensures alignment with corporate governance standards, and monitors the effectiveness of reporting mechanisms. The Board supports a culture of transparency, ethical conduct, and protection for individuals who report suspected misconduct or violations.

✿ Compliance Officer

The Compliance Officer is responsible for receiving whistleblower reports through designated secure channels. They ensure all reports are promptly and impartially investigated, maintaining strict confidentiality. The officer safeguards whistleblowers from retaliation, facilitates resolution of issues, and ensures that findings are reported to the Ethics Committee and relevant leadership for further action.

✿ Ethics Committee

The Ethics Committee reviews the outcomes of whistleblower investigations, evaluates the severity of the issues, and recommends appropriate corrective or disciplinary measures. The committee ensures fair and transparent processes are followed, tracks trends in reported misconduct, and advises on policy improvements to prevent recurrence and strengthen the organizational ethics framework.

✿ All Employees

All employees are expected to report any suspected violations of company policy, ethical standards, or legal requirements through the whistleblower channels provided. They must act in good faith, cooperate during investigations, and are protected from retaliation. Employees play a critical role in fostering an ethical, transparent, and accountable work environment at SSMI-AD.

✿ Third Parties

Third parties, including suppliers, contractors, and partners, are granted access to SSMI-AD's whistleblower mechanisms to report unethical or unlawful activities. They are expected to comply with the company's code of conduct and anti-bribery policies. SSMI-AD ensures confidentiality and protection from retaliation for any third party who reports in good faith.

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6. Stakeholder Reporting Mechanism Policy

6.1 Adequate Confidentiality Safeguards

SSMI-AD places utmost importance on confidentiality to protect the identity and integrity of whistleblowers. Access to reports and investigation data is strictly restricted to authorized personnel on a need-to-know basis. All digital records are secured using encryption technologies, with cybersecurity protocols regularly reviewed and updated. Physical documents are stored securely, and privacy training is provided to relevant employees. Breaches of confidentiality are treated as serious violations. The company ensures that whistleblower identities are protected throughout the investigation process and beyond. These safeguards create a safe space for individuals to raise concerns, thereby strengthening the effectiveness of the policy.

6.2 Legal Obligations

SSMI-AD's whistleblower framework is aligned with relevant national and international legal requirements to ensure full compliance. These include the Indian Prevention of Corruption Act, Whistle Blowers Protection Act, the Foreign Corrupt Practices Act (FCPA), and applicable UN conventions. Regular legal reviews are conducted to update procedures in line with evolving regulations. Training and compliance checks help ensure that investigators, managers, and stakeholders understand their legal obligations. Non-compliance not only exposes the company to penalties but undermines stakeholder trust. Therefore, adherence to all statutory and regulatory requirements is embedded in policy design, implementation, and review of the whistleblower system.

6.3 Concealment of Corruption Incidents

SSMI-AD takes proactive steps to prevent the concealment of corruption and bribery incidents by instituting strong internal controls, periodic audits, and anonymous reporting options. All reports are handled independently and escalated to relevant authorities when required. Employees are encouraged to report any anomalies, however minor, to enable early detection. Investigations are conducted impartially and confidentially, with clear documentation and accountability. Audit trails and compliance checklists are used to detect unreported issues. The organization's zero-tolerance stance on corruption is reinforced through leadership messaging and transparent enforcement, discouraging attempts to hide misconduct and fostering a culture of openness and accountability.

6.4 Sensitive Information Exposure

Data security is paramount to maintaining the integrity of the whistleblower process. SSMI-AD employs secure platforms that incorporate end-to-end encryption, access controls, and audit trails to prevent unauthorized access and data leaks. Periodic cybersecurity assessments and penetration tests are conducted to ensure resilience against emerging threats. Only authorized personnel have access to the whistleblower system, and usage is monitored for compliance. Any data breach is promptly addressed with corrective actions. This robust security framework protects sensitive information, preserves the anonymity of whistleblowers, and ensures compliance with privacy regulations, thereby maintaining the credibility and effectiveness of the reporting system.

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6.5 Cultural Barriers to Reporting

SSMI-AD understands that cultural norms, language barriers, and fear of hierarchy may deter employees from reporting unethical conduct. To overcome these challenges, we promote an inclusive and transparent culture where integrity is prioritized over seniority. Communication materials are made available in multiple languages and tailored to the workforce's diversity. Awareness sessions are conducted in culturally sensitive formats. Leadership is trained to encourage open dialogue and demonstrate non-retaliatory behavior. By integrating these practices into daily operations, SSMI-AD builds trust and empowers employees across all backgrounds to voice concerns freely, contributing to a stronger, more ethical organizational environment.

6.6 Third-Party Engagement in Anti-Corruption

Recognizing that corruption risks extend beyond internal operations, SSMI-AD mandates that third parties, including suppliers, contractors, and agents, comply with our whistleblower and anti-corruption policies. These requirements are included in contractual agreements and discussed during onboarding. We offer access to reporting channels and provide translated materials where necessary. Third-party breaches are investigated with equal rigor, and non-compliance may result in sanctions or termination of engagement. By extending our ethical standards across the value chain, we foster collective responsibility and mitigate corruption risks originating from external sources, in line with our ESG framework and sustainability-driven approach to stakeholder engagement.

6.7 Transparency in Outcomes

While respecting confidentiality, SSMI-AD provides anonymized summaries of whistleblower cases and outcomes to employees and stakeholders. These updates are shared through internal newsletters, annual ESG reports, or townhall meetings to highlight actions taken, lessons learned, and improvements made. Transparency helps build trust in the system and encourages more individuals to report unethical behavior. The company avoids disclosing sensitive information that may identify involved parties but ensures that trends and preventive measures are communicated. This balance between confidentiality and transparency supports a culture of accountability and reinforces SSMI-AD's commitment to ethical governance and continuous improvement.

6.8 Whistleblower Fatigue and Underreporting

To keep whistleblower systems active and responsive, SSMI-AD continuously evaluates the user experience and accessibility of reporting channels. Feedback is sought to identify difficulties in navigation or usage. User-friendly portals, mobile access, multilingual interfaces, and prompt support services are integrated into the system. Periodic reminders and leadership endorsements ensure sustained engagement. Employees are reassured of the importance of reporting, even for small concerns. We promote two-way communication and a no-blame culture to prevent reporting fatigue. These efforts help maintain high participation rates and ensure the whistleblower mechanism remains a dynamic and effective part of our integrity management program.

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6.9 Consistent Disciplinary Actions

SSMI-AD has developed a structured disciplinary framework to ensure that consequences for misconduct are consistent, fair, and proportionate. Violations of the anti-corruption or whistleblower policy are evaluated based on severity, intent, and impact. The Ethics Committee reviews cases and recommends disciplinary measures ranging from warnings to termination or legal action. Guidelines are documented and shared with stakeholders. Consistency is maintained across departments and hierarchical levels to avoid bias. Transparent enforcement reinforces deterrence and demonstrates our commitment to justice and accountability. This approach ensures that all stakeholders perceive the whistleblower system as credible, just, and genuinely protective.

6.10 Adequate Resources for Investigations

SSMI-AD is committed to ensuring that whistleblower reports are investigated thoroughly and without delay. To do so, we allocate adequate resources including skilled personnel, investigation tools, and legal support. In complex cases, external forensic experts or legal consultants may be engaged. Investigators receive periodic training to enhance their ability to handle sensitive cases, conduct interviews, gather evidence, and ensure procedural fairness. A centralized case management system supports effective tracking and documentation. The provision of sufficient investigative resources demonstrates SSMI-AD's commitment to ethical governance and ensures that no report is ignored or inadequately addressed due to operational constraints.

6.11 Sufficient Follow-Up on Reports

Timely and consistent follow-up is essential to maintaining trust in the whistleblower process. SSMI-AD ensures every report receives prompt acknowledgement and is logged in a secure, traceable system. Cases are assigned to trained investigators with a defined timeline for action. Whistleblowers are kept informed of progress where possible without compromising confidentiality. Delay in responses or investigations may erode confidence and lead to disengagement. Therefore, a monitoring mechanism is in place to track closure rates and identify bottlenecks. By institutionalizing structured follow-up procedures, the organization reinforces its commitment to listening, acting, and closing the loop on ethical concerns.

6.12 Conflict of Interest Undermining Reporting

To preserve the credibility of the whistleblower procedure, SSMI-AD mandates the declaration and mitigation of any conflict of interest (COI) in the handling of reports. Investigators, committee members, and decision-makers involved in a case must disclose any personal or professional relationship that could impair their objectivity. If a COI is identified, the individual is recused, and the case is reassigned. Oversight is provided by the Ethics Committee to ensure neutrality. This structured approach to managing COI enhances the legitimacy of investigative outcomes and reinforces stakeholder confidence that their concerns will be evaluated fairly, without bias or partiality.

6.13 Reporting Awareness

SSMI-AD addresses the risk of underreporting due to limited awareness through continuous communication and education efforts. All employees, vendors, and stakeholders are informed about the whistleblower system during onboarding and through routine training programs.

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Posters, intranet updates, and digital notices reinforce key messages on available channels, rights, and protections. Targeted sessions are held for high-risk departments. These initiatives are delivered in accessible formats and languages to reach diverse groups. Awareness campaigns are conducted quarterly to sustain attention. By demystifying the process and reassuring stakeholders of support, we empower more individuals to come forward confidently with integrity concerns.

6.14 Reprisal in High-Risk Jurisdictions

SSMI-AD recognizes that whistleblowers in certain jurisdictions may face elevated threats, including legal persecution or physical harm. To safeguard them, the company implements enhanced protections such as immediate access to legal counsel, anonymity through third-party reporting systems, and safe relocation or reassignment when required. We conduct region-specific risk assessments and tailor mitigation plans accordingly. Collaborations with local civil society organizations and legal experts may be pursued to reinforce protections. These measures ensure that whistleblower rights are respected globally, especially in high-risk regions, reaffirming our commitment to ethical operations and ESG-aligned practices across all geographical areas.


6.15 Retaliation Against Whistleblowers

SSMI-AD recognizes that fear of retaliation is a significant deterrent to reporting wrongdoing. To mitigate this risk, we enforce a strict non-retaliation policy for all individuals who report concerns in good faith. We ensure psychological safety by fostering a culture of respect, confidentiality, and accountability. Measures include protection from adverse employment actions, emotional support, and regular awareness on whistleblower protections. Any act of retaliation will itself be treated as a disciplinary violation. The company assures that no complainant will be penalized or disadvantaged for coming forward, which is vital for upholding our ethical standards and ESG commitments.

7. ESG Objectives


- Sustainability Issue** : **Adequate Confidentiality Safeguards**
Objective : Strengthen protection of whistleblower identity
Measure : % reports handled with confidentiality protocols
Target Value : ↑ 80%
- Sustainability Issue** : **Legal Obligations**
Objective : Ensure full compliance with whistleblower protection laws
Measure : % legal compliance audits completed
Target Value : ↑ 90%
- Sustainability Issue** : **Concealment of Corruption Incidents**
Objective : Ensure full disclosure and transparent recording of incidents
Measure : % verified reports disclosed
Target Value : ↑ 100%

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| 4. Sustainability Issue
Objective
Measure
Target Value | : Sensitive Information Exposure
: Safeguard sensitive information in whistleblower reports
: % systems with encryption controls
: ↑ 95% |
| 5. Sustainability Issue
Objective
Measure
Target Value | : Cultural Barriers to Reporting
: Promote a culture that encourages ethical reporting
: % of workforce trained in anti-retaliation and reporting culture
: ↑ 100% |
| 6. Sustainability Issue
Objective
Measure
Target Value | : Third-Party Engagement in Anti-Corruption
: Involve independent third parties in report investigation
: No. of third-party audits conducted
: ↑ 1/year |
| 7. Sustainability Issue
Objective
Measure
Target Value | : Transparency in Outcomes
: Communicate outcomes of whistleblower cases
: % of closed cases with feedback shared
: ↑ 65% |
| 8. Sustainability Issue
Objective
Measure
Target Value | : Whistleblower Fatigue and Underreporting
: Enhance trust and reduce barriers to reporting
: % increase in report submissions
: ↑ 50% |
| 9. Sustainability Issue
Objective
Measure
Target Value | : Consistent Disciplinary Actions
: Standardize enforcement actions for proven violations
: % of cases with uniform disciplinary procedures
: ↑ 100% |
| 10. Sustainability Issue
Objective
Measure
Target Value | : Adequate Resources for Investigations
: Allocate dedicated resources to support investigations
: % budget allocation to compliance unit
: ↑ 5% |
| 11. Sustainability Issue
Objective
Measure
Target Value | : Sufficient Follow-Up on Reports
: Ensure timely and complete follow-up of all reports
: % reports with follow-up completed
: ↑ 90% |

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12.Sustainability Issue

: Conflict of Interest Undermining Reporting

Objective

: Eliminate internal conflicts of interest in investigations

Measure

: % independent reviews performed

Target Value

: ↑ 70%

13.Sustainability Issue

: Reporting Awareness

Objective

: Raise stakeholder awareness about whistleblower mechanisms

Measure

: % stakeholders informed through outreach

Target Value

: ↑ 100%

14.Sustainability Issue

: Reprisal in High-Risk Jurisdictions

Objective

: Implement additional protections in high-risk regions

Measure

: % protected disclosures in high-risk zones

Target Value

: ↑ 60%

15.Sustainability Issue

: Retaliation Against Whistleblowers

Objective

: Prevent and penalize retaliation against whistleblowers

Measure

: % of retaliation cases acted upon

Target Value

: ↑ 55%

8. Applicable Standards, Laws, and Acts

- Prevention of Corruption Act,
- Companies Act 2013,
- IT Act 2000 (cyber whistleblowing).
- FCPA (US),
- UK Bribery Act,
- UN Global Compact Principle 10,
- OECD Guidelines for Multinational Enterprises, GRI 205.

9. Distribution and Annual Review

SSMI-AD ensures its whistleblower policy is well-communicated and accessible to all stakeholders through employee induction, annual refresher training, intranet access, and inclusion in third-party contracts. Key policy points are displayed on notice boards and digital portals to promote awareness and usage. The policy undergoes an annual review by the Compliance Officer, incorporating feedback, audit insights, legal updates, and investigation learnings. Recommendations are submitted to the Board for approval, ensuring alignment with anti-corruption and ESG standards. This cyclical review enhances detection mechanisms, procedural fairness, and stakeholder trust, reinforcing SSMI-AD's commitment to ethical governance and continuous improvement.

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10. Disciplinary Action for Violators

SSMI-AD takes verified violations of anti-corruption and whistleblower policies seriously. Depending on the nature and severity of the misconduct, disciplinary measures may include verbal or written warnings, suspension, demotion, termination of employment, or legal prosecution under applicable laws. The company also safeguards the system from abuse—false, malicious, or intentionally misleading reports are subject to investigation and may lead to disciplinary action. This balanced approach fosters accountability and ensures the whistleblower framework remains credible, effective, and fair for all parties involved, thereby maintaining trust and integrity in SSMI-AD's ethical and legal compliance systems.

11. Reporting Mechanism

SSMI-AD offers multiple confidential channels to facilitate safe and secure whistleblower reporting. Individuals may report concerns via email, phone hotline, or a secure third-party anonymous reporting portal. All reports are treated with the utmost confidentiality, and whistleblowers are guaranteed protection against any form of retaliation. Upon receipt, acknowledgments are sent within 48 hours, and investigations are initiated promptly by the Compliance Officer or relevant authorities. Clear communication, tracking mechanisms, and transparent handling of reports ensure timely action. These trusted mechanisms reinforce SSMI-AD's commitment to ethical conduct and support early detection and resolution of integrity-related risks.

12. Conclusion

At SSMI-AD, integrity and ethical conduct are foundational principles embedded in our business culture. The whistleblower policy serves as a critical instrument for uncovering unethical practices, preventing corruption, and strengthening transparency. It supports early intervention and risk mitigation, thus protecting the organization and its stakeholders. This initiative reflects SSMI-AD's ESG commitment and upholds stakeholder confidence by fostering an open, non-retaliatory environment where individuals feel empowered to report concerns. Through continuous training, secure reporting channels, and responsive action, the company ensures the whistleblower program remains a cornerstone of corporate accountability and sustainable governance.

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15. Social Compliance Policy

SSMI-AD/ESG/POLICY-15

1. Purpose

SSMI-AD is committed to ensuring that all suppliers uphold responsible social practices, including respect for human rights, fair labor conditions, ethical business conduct, and anti-corruption principles. These expectations are aligned with international standards and ESG principles, fostering a responsible, transparent, and sustainable supply chain that supports long-term value creation for all stakeholders.

2. Scope of Application

This policy applies to all SSMI-AD employees involved in procurement, supply chain, and vendor management, as well as all Tier 1 suppliers. It covers procurement activities, supplier selection, contract oversight, and supply chain operations across all SSMI-AD business units in India and international regions where suppliers or operations are located.

3. Governance

The Procurement & ESG Committee is responsible for implementing this policy, conducting periodic reviews, engaging with suppliers, and resolving grievances. It ensures alignment with ESG standards and drives continuous improvement. Oversight is provided by the Board ESG Sub-Committee, which monitors strategic direction, reviews outcomes, and ensures accountability in sustainable procurement and supply chain practices.

4. Definitions

✿ Supplier Social Practices

Supplier social practices refer to a defined set of ethical standards that all suppliers must adhere to, focusing on labor rights, human rights, non-discrimination, health and safety, and fair business conduct. These practices are essential for ensuring responsible operations and alignment with international social and ethical compliance frameworks.

✿ Social Impact Assessment

A social impact assessment evaluates how a supplier's operations affect workers, local communities, and vulnerable groups. It identifies potential and actual risks related to labor conditions, community well-being, and human rights, enabling informed decisions and targeted interventions to enhance positive outcomes and reduce negative social impacts across the supply chain.

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Due Diligence

Due diligence is a structured process to identify, assess, and mitigate social risks in the supply chain. It involves proactive investigation into suppliers' practices, continuous monitoring, and corrective action where needed. This process ensures compliance with social responsibility standards and reinforces accountability for upholding human rights and ethical labor practices.

5. Roles and Responsibilities

ESG Officer

The ESG Officer is responsible for developing and implementing the social audit framework, conducting supplier social risk assessments, and integrating ESG criteria into procurement processes. They also collaborate with stakeholders to ensure alignment with international standards and oversee the evaluation of supplier performance related to social responsibility and ethical practices.

Procurement Head

The Procurement Head ensures that supplier selection and onboarding processes incorporate social responsibility criteria. They are accountable for verifying that all vendors meet the required social standards, monitoring ongoing supplier performance, and driving supplier improvement programs to align procurement decisions with SSMI-AD's ESG and ethical sourcing commitments.

Legal & Compliance

The Legal and Compliance team ensures that all supplier contracts contain robust clauses related to human rights, labor standards, and anti-corruption. They monitor supplier compliance with legal and regulatory requirements and support grievance redressal and enforcement mechanisms when social non-compliance or contract breaches are identified.

Suppliers

Suppliers are expected to fully comply with the SSMI-AD Supplier Code of Conduct, which includes standards on labor rights, human rights, health and safety, and anti-corruption. They must participate in audits, cooperate with assessments, and take corrective actions when non-compliance is identified to maintain their approved supplier status.

HR & Training Team

The HR & Training Team is responsible for designing and delivering training programs for procurement personnel and suppliers. These trainings focus on social compliance expectations, human rights, labor practices, and responsible sourcing principles, ensuring all stakeholders understand and uphold SSMI-AD's social and ethical standards in supply chain operations.

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6. Social Compliance Policy

6.1 Grievance Mechanisms

Suppliers must establish accessible, confidential, and non-retaliatory grievance mechanisms to allow workers to report concerns about labor conditions, safety, discrimination, or human rights violations. Worker surveys, helplines, or anonymous reporting channels must be implemented. Grievances must be resolved promptly, with clear records of actions taken. SSMI-AD will review supplier grievance processes during audits to ensure functionality and fairness. Suppliers who demonstrate responsiveness and effective worker engagement will be rewarded. This ensures accountability, transparency, and worker empowerment across the supply chain, reducing risks of hidden violations and enhancing trust between employers and employees.

6.2 Supplier ESG Audits

SSMI-AD conducts on-site and virtual audits of suppliers to verify their adherence to our social and environmental standards. These audits may be planned or unannounced, and they include reviews of labor conditions, occupational health and safety, environmental practices, and business ethics. Trained auditors assess compliance with contractual terms and ESG benchmarks. Audit findings inform remediation plans or enforcement actions, depending on the severity of non-compliance. This audit mechanism is essential for ESG due diligence and encourages continuous improvement. The process reinforces our commitment to transparency, supplier accountability, and the protection of workers' rights.

6.3 Non-Discrimination and Equal Opportunities

SSMI-AD prohibits any form of discrimination in supplier workplaces, including bias based on gender, caste, religion, ethnicity, disability, or age. Suppliers must ensure equal treatment in recruitment, training, promotions, and pay structures. Disciplinary actions, harassment, or abuse of workers will not be tolerated. Suppliers should adopt Diversity, Equity, and Inclusion (DEI) policies and report progress annually. SSMI-AD will prioritize suppliers who demonstrate leadership in diversity hiring, equal pay initiatives, and inclusive workplace culture. By embedding fairness and equality, SSMI-AD promotes human dignity and social justice across its global supply chains.

6.4 Supplier Voice Systems

SSMI-AD establishes mechanisms that allow supplier employees and affected stakeholders to report grievances anonymously and without fear of retaliation. These include surveys, helplines, and digital platforms accessible to all workers, including vulnerable groups and indigenous communities. These tools provide early warnings of labor rights violations, unsafe conditions, or unethical practices. All reports are handled confidentially and are followed up within agreed timelines. By empowering workers to voice concerns, SSMI-AD promotes fairness, inclusivity, and accountability throughout the supply chain. The worker voice mechanisms also contribute to improved working environments and stronger supplier relationships based on trust and transparency.

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6.5 Fair Wages and Working Hours

SSMI-AD requires all suppliers to provide fair compensation and reasonable working hours in accordance with Indian labor laws, ILO Conventions, and international best practices. Excessive overtime, unpaid labor, and unfair wage deductions are strictly prohibited. Suppliers must ensure equal pay for equal work and comply with minimum wage regulations. SSMI-AD will monitor supplier practices through audits and wage verification. Preference will be given to suppliers who go beyond compliance by offering living wages, transparent wage structures, and benefits that enhance worker well-being. This ensures dignity, fairness, and economic security across our supply chain.

6.6 Supply Chain Assessment

SSMI-AD conducts regular risk assessments to identify and evaluate potential adverse impacts across the supply chain. These assessments consider factors such as labor practices, environmental violations, human rights breaches, and risks of corruption. Suppliers are evaluated using a severity and likelihood-based framework, enabling prioritization of engagement and mitigation efforts. High-risk suppliers are flagged for more rigorous due diligence or audits. Risk assessment outcomes inform sourcing decisions, helping SSMI-AD avoid complicity in unethical practices. This structured approach to risk identification supports long-term supplier partnerships rooted in responsible business conduct and sustainability.

6.7 Freedom of Association

SSMI-AD recognizes the rights of workers to freely associate, form unions, and engage in collective bargaining as per ILO Convention 87 and 98. Suppliers must not interfere with or retaliate against workers exercising these rights. Collective agreements must be respected, and workers must have the freedom to choose representation. Where formal union structures are absent, suppliers should establish alternative mechanisms for dialogue, ensuring workers' voices are heard. SSMI-AD values transparent and constructive labor relations and will prioritize suppliers who demonstrate respect for worker representation and cooperative engagement.

6.8 Ethical Business Conduct

Suppliers must operate with integrity, free from bribery, corruption, or unethical practices in procurement. SSMI-AD requires compliance with Indian Prevention of Corruption Act, UK Bribery Act, and FCPA standards. Any attempt to offer, solicit, or accept bribes, gifts, or undue advantages will result in disciplinary measures. Suppliers must establish anti-corruption training, whistleblower systems, and internal controls. SSMI-AD audits supplier compliance regularly and will terminate contracts if unethical conduct is identified. Partnerships are built on transparency, fairness, and responsible procurement to uphold trust and reputation in global markets.

6.9 Procurement Ethics Training

SSMI-AD ensures that all procurement professionals are trained to recognize and address social issues within the supply chain. Training modules cover topics such as forced labor, child labor, discrimination, health and safety standards, and ethical sourcing.

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These sessions equip buyers with the knowledge to make informed decisions that align with SSMI-AD's ESG objectives. Ongoing training also includes updates on relevant laws, international conventions, and internal policies. By building awareness and capacity among procurement staff, SSMI-AD fosters a responsible procurement culture and strengthens the company's ability to manage social risks effectively across its operations.

6.10 Vendor Awareness Programs

SSMI-AD invests in the long-term development of its suppliers by offering capacity-building programs aimed at addressing sustainability risks. These initiatives include training sessions, workshops, toolkits, and one-on-one technical support. The focus areas include labor rights, environmental management, ethical conduct, and social compliance. Capacity building may be conducted proactively or as a corrective response following audits or assessments. Through these efforts, SSMI-AD helps suppliers understand and implement best practices, thereby strengthening resilience across the supply chain. We believe that empowering suppliers fosters mutual growth, promotes ethical sourcing, and builds a culture of shared ESG responsibility.

6.11 Safe and Healthy Working Conditions

Suppliers must maintain safe workplaces that prevent occupational hazards, especially in industries involving heavy machinery, high temperatures, and chemical exposure. SSMI-AD requires suppliers to implement occupational health and safety systems, provide adequate PPE, conduct regular safety drills, and ensure workers are trained on emergency preparedness. Accident rates, injuries, and near misses must be tracked and reported. Suppliers failing to provide safe environments will be required to take corrective action. SSMI-AD prioritizes partnerships with suppliers certified under ISO 45001 or equivalent, ensuring workers' health and safety are protected at all times.

6.12 Emergency Preparedness

Suppliers must ensure robust occupational health and safety systems are in place to reduce accidents such as burns, cuts, or toxic exposure. Emergency preparedness measures, including fire safety, chemical leak management, and explosion prevention, must be established and practiced regularly. Suppliers should maintain first aid, emergency exits, and evacuation procedures in compliance with national laws. SSMI-AD will monitor accident rates and require suppliers to adopt ISO 45001 standards. Workers' health and safety are non-negotiable, and suppliers failing to provide safe working environments will be subject to corrective actions.

6.13 Sustainability Practice Review

To ensure compliance with ESG standards, SSMI-AD implements structured assessments of its suppliers' social practices. These are conducted through self-assessment questionnaires designed to evaluate ethical labor conditions, anti-discrimination practices, health and safety compliance, and other social indicators. Suppliers demonstrating gaps may be subject to follow-up audits or development plans. The assessment process fosters supplier accountability and encourages transparency in reporting. Insights from these evaluations are used to improve performance, identify systemic issues, and make procurement decisions that favor suppliers committed to ethical and responsible practices. SSMI-AD values continuous improvement and supports corrective action where necessary.

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6.14 Sustainability Clause Integration

SSMI-AD embeds social and sustainability clauses into all supplier contracts to ensure alignment with our ESG values. These clauses mandate compliance with ethical labor standards, environmental protection, anti-corruption laws, and respect for human rights. They apply to all agreements regardless of size or subject. The inclusion of such clauses is a proactive measure to safeguard against ESG violations. In cases of non-compliance, SSMI-AD may take corrective action, impose penalties, or terminate the business relationship. The contractual approach reinforces our expectations for supplier conduct and creates a foundation for monitoring and enforcement across our global supply chain.

6.15 Child Labor Prohibition

SSMI enforces a strict zero-tolerance policy against child labor in its supply chain. Suppliers must comply with Indian Child Labour (Prohibition and Regulation) Act, ILO Convention 138, and 182, ensuring no workers under the legal minimum age are employed. Age verification processes must be implemented at recruitment stages. If child labor is found, suppliers must engage in remediation programs, ensuring children are withdrawn from hazardous work and supported in accessing education. SSMI-AD conducts audits and due diligence to prevent child labor and will terminate partnerships with suppliers unwilling to take corrective action.

6.16 Buyer Sustainability Metrics

SSMI-AD embeds sustainability metrics into the performance appraisals of its procurement personnel to ensure accountability. Buyers are evaluated on their ability to integrate ESG principles into procurement strategies, supplier evaluations, and risk mitigation. This includes ethical sourcing, environmental impact considerations, and engagement with responsible suppliers. Linking performance reviews to sustainability outcomes reinforces our corporate values and ensures that decision-making is guided by more than just price and efficiency. This approach empowers procurement teams to become ESG champions and aligns individual objectives with organizational sustainability goals, promoting a culture of continuous improvement and ethical conduct.

6.17 ESG Performance Rewards

To encourage responsible behavior, SSMI-AD has established incentive programs that recognize suppliers demonstrating outstanding social performance. Rewards may include public recognition, priority in future procurement, or long-term contract eligibility. This positive reinforcement motivates suppliers to adopt higher ESG standards, improve working conditions, and integrate ethical practices. The program promotes transparency, responsible innovation, and collaboration on sustainability goals. SSMI-AD uses this approach not just to reward past performance, but also to stimulate ongoing progress and improvement. By aligning business incentives with ethical outcomes, we foster a more resilient and values-driven supply chain.

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6.18 Forced and Bonded Labor

Suppliers must not engage in forced, bonded, or trafficked labor. Practices such as retaining identity documents, charging recruitment fees, or coercing workers are strictly prohibited. Migrant workers must be employed under voluntary and fair contracts. SSMI-AD requires suppliers to demonstrate transparent hiring practices and compliance with ILO Conventions 29 and 105. Workers must have the right to leave employment with reasonable notice. Violations will result in immediate supplier review, corrective measures, or contract termination. Through rigorous monitoring, SSMI-AD ensures the protection of workers' freedom and dignity throughout the supply chain.

7. ESG Objectives

1. Sustainability Issue : Grievance Mechanisms

Objective : Ensure supplier workers have access to effective grievance channels
Measure : % suppliers with grievance systems
Target Value : 55% ↑

2. Sustainability Issue : Supplier ESG Audits

Objective : Increase supplier ESG compliance through regular audits
Measure : No. of audits conducted
Target Value : 3 ↑

3. Sustainability Issue : Non-Discrimination and Equal Opportunities

Objective : Promote equal opportunities across supply chain
Measure : % suppliers with non-discrimination policy
Target Value : 80% ↑

4. Sustainability Issue : Supplier Voice Systems

Objective : Strengthen communication channels for supplier employees
Measure : % suppliers with voice systems
Target Value : 50% ↑

5. Sustainability Issue : Fair Wages and Working Hours

Objective : Ensure fair pay and compliance with working hour regulations
Measure : % suppliers audited for wage/hour compliance
Target Value : 55% ↑

6. Sustainability Issue : Supply Chain Assessment

Objective : Enhance monitoring of supplier social practices
Measure : No. of supplier assessments
Target Value : 10 ↑

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7. Sustainability Issue : Freedom of Association

Objective : Safeguard rights of workers to organize
Measure : % suppliers respecting FOA rights
Target Value : 80% ↑

8. Sustainability Issue : Ethical Business Conduct

Objective : Promote ethical conduct in supplier operations
Measure : % suppliers with code of ethics
Target Value : 85% ↑

9. Sustainability Issue : Procurement Ethics Training

Objective : Train procurement staff on ethical sourcing
Measure : No. of staff trained
Target Value : 25 ↑

10. Sustainability Issue: Vendor Awareness Programs

Objective : Enhance supplier awareness of ESG standards
Measure : No. of vendors trained
Target Value : 25 ↑

11. Sustainability Issue: Safe and Healthy Working Conditions

Objective : Improve health and safety in supply chain
Measure : % suppliers meeting safety standards
Target Value : 80% ↑

12. Sustainability Issue: Emergency Preparedness

Objective : Ensure suppliers are prepared for emergencies
Measure : % suppliers with preparedness plans
Target Value : 60% ↑

13. Sustainability Issue: Sustainability Practice Review

Objective : Regularly review suppliers' sustainability practices
Measure : No. of reviews conducted
Target Value : 15 ↑

14. Sustainability Issue: Sustainability Clause Integration

Objective : Integrate ESG clauses into supplier contracts
Measure : % contracts with ESG clauses
Target Value : 70% ↑

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15. Sustainability Issue: Child Labor Prohibition

Objective : Eliminate child labor in supply chain
Measure : % suppliers verified child-labor free
Target Value : 100% ↑

16. Sustainability Issue: Buyer Sustainability Metrics

Objective : Incorporate sustainability criteria in supplier evaluation
Measure : % supplier evaluations with ESG metrics
Target Value : 65% ↑

17. Sustainability Issue: ESG Performance Rewards

Objective : Incentivize high-performing suppliers
Measure : No. of suppliers rewarded
Target Value : 5 ↑

18. Sustainability Issue: Forced and Bonded Labor

Objective : Prevent forced and bonded labor in supply chain
Measure : % suppliers verified free of forced labor
Target Value : 100% ↑

8. Applicable Standards, Laws & Acts

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- Global Reporting Initiative (GRI)
- Conflict-Free Smelter Initiative (CFSI)
- Aluminum Stewardship Initiative (ASI)
- UK Bribery Act, US FCPA
- Factories Act, 1948
- Minimum Wages Act, 1948
- Child Labour (Prohibition and Regulation) Act, 1986
- POSH Act, 2013

9. Distribution and Annual Review

SSMI-AD ensures the Responsible Supplier Social Practices Policy is widely accessible and clearly understood by all stakeholders. It is shared with procurement teams during onboarding, with suppliers during registration and contracting, and made available on the website and supplier portal. Translations address language differences to enhance comprehension.

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The ESG Officer leads an annual policy review with input from Legal, Procurement, and Compliance teams, considering legal updates, risk assessments, audits, and stakeholder feedback. Revisions are approved by the Procurement & ESG Committee and Board ESG Sub-Committee, ensuring alignment with SSMI-AD's values and global best practices.

10. Disciplinary Action for Violators

SSMI-AD enforces a zero-tolerance approach toward supplier violations of social responsibility principles. Confirmed breaches—such as human rights abuses, forced labor, or unethical conduct—may result in severe consequences. These include suspension or termination of contracts, delisting of the supplier from SSMI-AD's approved vendor list, and, when applicable, legal proceedings or reporting to regulatory authorities. Internal employees facilitating or overlooking such violations may also face disciplinary measures. These enforcement actions reinforce SSMI-AD's firm commitment to ethical sourcing and protect workers, communities, and stakeholder trust in our operations. All actions will be consistent with legal due process and company protocols.

11. Reporting Mechanism

SSMI-AD offers multiple confidential channels for reporting supplier-related violations or concerns involving social practices. Suppliers, employees, or stakeholders may use the ESG Helpline (a secure phone line), email reports to nagaraj@sreesumangala.com, or submit concerns via the anonymous Whistleblower Portal on the company website. All reports are acknowledged within a defined timeframe, and investigations are handled by the ESG and Compliance teams in a fair and confidential manner. Whistleblowers are protected from retaliation under SSMI-AD's Whistleblower Policy. This open, accessible reporting mechanism encourages transparency, accountability, and early identification of issues within the supply chain.

12. Conclusion

SSMI-AD believes that responsible and ethical supplier conduct is a cornerstone of sustainable business. This policy reinforces our commitment to fostering supply chain relationships grounded in transparency, human dignity, and continuous ESG improvement. By collaborating with suppliers who uphold high social and ethical standards, SSMI-AD reduces operational risks and strengthens resilience. Our shared values create long-term value for stakeholders, improve community well-being, and contribute to global efforts for fair labor and anti-corruption. SSMI-AD remains dedicated to monitoring, engaging, and supporting our suppliers to meet these principles and ensuring that all supply chain partners align with our corporate integrity.

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16. Fraud Prevention Policy

SSMI-AD/ESG/POLICY-16

1. Purpose

SSMI-AD is committed to preventing, detecting, and responding to any fraudulent acts across its operations and supply chains. This includes safeguarding company assets, promoting ethical conduct, and upholding the trust of all stakeholders. Through proactive oversight, clear reporting channels, and strict accountability, SSMI-AD ensures integrity is maintained in all business dealings and operational processes.

2. Scope of Application

This policy applies to all SSMI-AD employees, contractors, suppliers, agents, and third-party associates. It covers all business areas including operations, procurement, finance, human resources, sales, and distribution. The geographical scope includes all SSMI-AD operational sites and markets, both within India and across international locations where business is conducted.

3. Governance

The Board-level ESG and Ethics Committee holds ultimate oversight responsibility for fraud risk management. It ensures strategic alignment with ethical standards and regulatory expectations, regularly reviewing reports, audit findings, and incidents to guide corrective actions and policy updates. The Compliance Officer leads implementation, collaborating closely with Risk Management and Internal Audit to identify fraud risks, enforce controls, monitor compliance, and conduct investigations.

4. Definition of Terms

✿ Fraud

Fraud involves the deliberate act of deception or misrepresentation intended to secure an unfair or unlawful gain. It can include theft, falsification of records, embezzlement, and misreporting. Fraud undermines ethical standards, damages organizational reputation, and may lead to legal penalties, financial loss, and erosion of stakeholder trust.

✿ External Stakeholders

External stakeholders are individuals or organizations not directly employed by the company but significantly impacted by its operations. These include suppliers, contractors, customers, regulatory bodies, local communities, and advocacy groups. Their rights, expectations, and concerns are crucial for sustainable operations, ethical conduct, compliance, and long-term business resilience.

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✳ Human Rights

Human rights are universal entitlements that belong to all individuals, regardless of status, protected by national laws and global conventions. These include the rights to life, dignity, fair treatment, freedom from discrimination, and safe working conditions. Upholding human rights ensures ethical responsibility and fosters stakeholder trust in business operations.

5. Roles and Responsibilities

✳ Management

Management is responsible for establishing robust internal controls to prevent and detect fraud. They must investigate reported incidents promptly, take corrective action, and enforce compliance with this policy. By fostering a culture of integrity and accountability, management ensures that operations align with SSMI-AD's ethical standards and regulatory obligations.

✳ Employees

Employees must comply with all anti-fraud policies and report any suspicious activities or violations immediately through approved channels. They are expected to act transparently, uphold ethical conduct, and fully cooperate during investigations. Every employee plays a critical role in safeguarding the company's assets, reputation, and commitment to zero-tolerance for fraud.

✳ Vendors/Partners

Vendors and business partners must agree to SSMI-AD's ethical conduct clauses within contracts and cooperate during audits or investigations. They are expected to maintain transparent business practices, report any unethical behavior, and support the company's efforts to detect and prevent fraud across the supply chain and external stakeholder engagements.

✳ Internal Audit Team

The Internal Audit Team is tasked with conducting regular fraud risk assessments and reviewing internal controls for weaknesses. They provide independent oversight, identify emerging risks, and recommend improvements. Their findings help ensure continuous enhancement of the fraud management system and uphold the organization's ethical and ESG commitments.

6. Fraud Prevention Policy

6.1 Retaliation Beyond Organization

SSMI-AD ensures a safe and supportive environment for whistleblowers, including contractors, vendors, and external stakeholders. Individuals who report unethical behavior, fraud, or human rights concerns are protected from retaliation, harassment, or victimization.

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The company maintains anonymous channels for lodging complaints and follows up with impartial investigations. Retaliation in any form—whether direct or indirect—is strictly prohibited and will lead to disciplinary measures. Protecting whistleblowers helps identify hidden issues and improves organizational transparency. This commitment applies equally to internal and external parties who act in good faith.

6.2 Supply Chain Deception

SSMI-AD prohibits the use of forged documents or misrepresentation to hide exploitative labor practices within the supply chain. Labor contracts, wage records, safety training logs, and working hour documentation must be authentic and verifiable. Suppliers found guilty of masking child labor, forced labor, or unsafe work conditions through false documentation will be delisted and reported to relevant authorities. Surprise audits, worker interviews, and community outreach are conducted to validate labor practices. Ethical sourcing requires transparency at every level, and suppliers must cooperate fully with investigations.

6.3 Improper Licensing Methods

SSMI-AD maintains strict ethical standards in all dealings with public officials. Obtaining permits, licenses, or approvals through bribery, gifts, or other forms of inducement is strictly prohibited. All interactions with government bodies must be properly documented and compliant with anti-bribery laws. Employees must not engage in or condone informal payments to expedite regulatory processes. Violations will result in disciplinary action and may be reported to law enforcement. Upholding transparency in public interactions is key to ethical business conduct and regulatory compliance.

6.4 False Compliance Claims

SSMI-AD does not tolerate the concealment of human rights violations through falsified reports or manipulated audit data. Field officers, auditors, and third-party social assessors are expected to report findings honestly, without omission or alteration. Attempts to cover up unsafe labor conditions, wage abuse, or discrimination by altering documentation are treated as acts of fraud. Independent human rights audits must reflect actual site conditions. Those found falsifying records will face disciplinary or legal action. Transparency is critical to upholding our ESG commitments and ensuring accountability across our value chain.

6.5 Forgery of Supplier Certifications

SSMI-AD requires all supplier certifications, licenses, and declarations to be authentic, up-to-date, and issued by recognized authorities. Any forgery, fabrication, or alteration of documents submitted by suppliers or third-party partners is strictly prohibited and will lead to blacklisting. Internal teams are responsible for cross-verifying key supplier certifications such as ISO, REACH, RoHS, and environmental clearances. Suspicious or unverifiable documents must be flagged for review. SSMI-AD does not tolerate unethical behavior across the supply chain and reserves the right to terminate contracts based on document fraud or misrepresentation of compliance credentials.

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6.6 Fake ESG or CSR Reporting

SSMI-AD is committed to accurate and auditable disclosures of its Environmental, Social, and Governance (ESG) and Corporate Social Responsibility (CSR) performance. Deliberate falsification of sustainability metrics, achievements, or stakeholder engagement activities is considered corporate fraud. ESG reports must be compiled based on verified data and undergo independent verification wherever feasible. False reporting not only misleads stakeholders but also undermines the integrity of the company's sustainability agenda. Internal reporting officers, department heads, and consultants involved in ESG or CSR documentation are held accountable for the accuracy of reported information.

6.7 Procurement Integrity Breach

SSMI-AD enforces a transparent and competitive procurement process where fairness, objectivity, and ethical conduct are mandatory. Unfair practices—including bid rigging, favoritism, kickbacks, or any attempt to manipulate the selection process—are strictly forbidden. Employees involved in procurement must declare any potential conflicts of interest and recuse themselves from biased decision-making. Evaluation criteria must be standardized and applied uniformly to all bidders. Any attempts to influence procurement decisions through bribery or personal relationships will trigger immediate investigation and corrective action. All vendors are expected to comply with SSMI-AD's ethical sourcing standards throughout the engagement.

6.8 False Labelling Practices

SSMI-AD strictly prohibits any misrepresentation in product specifications, material composition, or sourcing information provided to clients, regulators, or other stakeholders. Accurate and truthful disclosure is central to our values of integrity and transparency. All product documentation must undergo verification before release. Employees involved in product development, quality control, or customer service must ensure all claims made about the product are verifiable and substantiated by supporting documents or certifications. Misleading clients or authorities not only damages trust but also exposes the organization to legal and reputational risks. Violations of this policy will lead to disciplinary or legal consequences.

6.9 Due Influence in Regulatory Filings

SSMI-AD mandates complete honesty in all dealings with regulatory authorities. Regulatory filings, audit responses, and license applications must be truthful, complete, and submitted on time. Attempts to mislead, falsify data, or improperly influence inspectors, government officials, or auditors—whether through gifts, money, or favors—constitute fraud. Employees involved in regulatory affairs are trained to ensure data accuracy and integrity. The company follows a transparent documentation trail for all interactions with public offices. Breaches of this policy will result in strict penalties, up to and including legal prosecution. Maintaining clean and ethical regulatory engagement is non-negotiable.

6.10 Diversion of Funds

SSMI-AD has implemented robust controls to prevent financial fraud involving fictitious or shell vendors. All vendors must undergo a rigorous verification process, including background checks and banking validations, before being added to the approved vendor list.

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Payments are only made to registered entities with verified credentials. Employees found colluding to divert funds to fraudulent entities will be subject to immediate disciplinary and legal action. Financial transparency and strong internal controls are critical to preventing misuse of funds and maintaining trust in company financial systems.

6.11 Ethical Marketing Conduct

SSMI-AD ensures that all marketing, advertising, and promotional content reflects factual, accurate, and substantiated claims about its products and operations. The company prohibits exaggerated, ambiguous, or misleading messages directed at customers, regulators, or the general public. Marketing teams must validate all performance claims through internal review and maintain supporting evidence. Promotional campaigns must not create unrealistic expectations or misstate compliance, quality, or sustainability attributes. Deceptive marketing not only misleads stakeholders but also violates ethical standards and applicable consumer protection laws. SSMI-AD takes swift disciplinary action against violations to uphold stakeholder trust.

6.12 Fraud in Export/Import Declarations

SSMI-AD adheres strictly to domestic and international trade laws. The company prohibits misclassification of goods, false invoicing, under-invoicing, over-invoicing, and other fraudulent activities related to customs declarations. Export and import documentation must be accurate, and any discrepancy will trigger investigation. Employees working in logistics, shipping, and trade compliance must be trained on legal requirements. Attempts to evade taxes, duties, or international sanctions not only violate company policy but also expose SSMI-AD to serious legal and financial risks. Zero tolerance will be shown to fraudulent practices in cross-border trade activities.


6.13 Concealed Ethical Conflicts

Employees, suppliers, contractors, and business partners are required to disclose any real or perceived conflicts of interest that may affect business integrity. A conflict arises when personal, financial, or familial relationships influence—or appear to influence—professional decision-making. Non-disclosure is treated as a serious breach of trust. Employees must annually complete conflict-of-interest declarations, and vendors must declare affiliations with SSMI-AD personnel. Where conflicts are identified, mitigating measures—such as reassignment or withdrawal from decision-making—are implemented. Transparency in these matters preserves objectivity, avoids ethical lapses, and protects the reputation of the company.

6.14 Proper Resource Use

SSMI-AD is committed to responsible management of funds allocated for community development and CSR projects. These funds must be used solely for their intended purposes and must be supported by accurate records, receipts, and audit trails. Any misappropriation, personal gain, or use of such funds for unauthorized purposes is treated as fraud. Project managers and CSR teams are required to maintain detailed documentation and undergo regular audits. Accountability in social investment is essential for building stakeholder trust and fulfilling our ESG objectives.

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6.15 Corrupt Third-Party Intermediaries

SSMI-AD requires that all third-party intermediaries—including agents, consultants, and distributors—abide by strict anti-corruption standards. Prior to engagement, these parties must undergo comprehensive due diligence and sign anti-bribery and anti-corruption agreements. SSMI-AD maintains zero tolerance toward facilitation payments, kickbacks, or any form of unethical advantage gained through third parties. These partners must also adhere to transparency in financial transactions, and their operations are subject to periodic audits. Any third-party found involved in corrupt practices will be immediately disqualified from further association. These requirements apply equally to domestic and international intermediaries.

7. ESG Objectives

- 1. Sustainability Issue : Retaliation Beyond Organization**
Objective : Protect external whistleblowers from retaliation
Measure : # of external retaliation cases reported
Target Value : ↓ 0
- 2. Sustainability Issue : Supply Chain Deception**
Objective : Detect and prevent fraudulent practices within the supply chain
Measure : % of suppliers subjected to fraud risk assessment
Target Value : ↑ 100%
- 3. Sustainability Issue : Improper Licensing Methods**
Objective : Ensure full regulatory compliance in licensing
Measure : % of licenses verified through legal channels
Target Value : ↑ 45%
- 4. Sustainability Issue : False Compliance Claims**
Objective : Prevent misrepresentation of ESG or legal adherence
Measure : % of compliance documents internally verified
Target Value : ↑ 60%
- 5. Sustainability Issue : Forgery of Supplier Certifications**
Objective : Detect and prevent fraudulent supplier documents
Measure : % of supplier certifications cross-verified
Target Value : ↑ 60%
- 6. Sustainability Issue : Fake ESG or CSR Reporting**
Objective : Ensure accuracy in sustainability disclosures
Measure : No. of ESG/CSR reports audited by third parties
Target Value : ↑ 1/year

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7. Sustainability Issue

: Procurement Integrity Breach

Objective

: Maintain ethical procurement practices

Measure

: % of procurement processes monitored for fraud

Target Value

: ↑ 85%

8. Sustainability Issue

: False Labelling Practices

Objective

: Prevent incorrect product labeling

Measure

: % of product labels verified for accuracy

Target Value

: ↑ 80%

9. Sustainability Issue

: Due Influence in Regulatory Filings

Objective

: Maintain transparency in government submissions

Measure

: # of regulatory violations reported

Target Value

: ↓ 0

10. Sustainability Issue

: Diversion of Funds

Objective

: Prevent misappropriation of allocated budgets

Measure

: % of financial audits completed

Target Value

: ↑ 100%

11. Sustainability Issue

: Ethical Marketing Conduct

Objective

: Promote truthfulness in communications

Measure

: % of marketing materials reviewed for compliance

Target Value

: ↑ 90%

12. Sustainability Issue

: Fraud in Export/Import Declarations

Objective

: Ensure accuracy in trade documentation

Measure

: % of export/import files verified for accuracy

Target Value

: ↑ 80%

13. Sustainability Issue

: Concealed Ethical Conflicts

Objective

: Identify and disclose conflicts of interest

Measure

: % of employees/vendors submitting conflict declarations

Target Value

: ↑ 90%

14. Sustainability Issue

: Proper Resource Use

Objective

: Prevent unauthorized use of company resources

Measure

: No. of internal audits addressing misuse of assets

Target Value

: ↑ 1/year

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15. Sustainability Issue

: Corrupt Third-Party Intermediaries

Objective

: Vet third-party agents for ethical practices

Measure

: % of third parties screened for corruption risk

Target Value

: ↑ 90%

8. Applicable Standards, Laws, and

- Foreign Corrupt Practices Act (FCPA)
- UN Global Compact Principles
- OECD Guidelines for Multinational Enterprises
- Global Reporting Initiative (GRI 205, 406)
- ISO 37001 Anti-Bribery Management Systems
- Aluminum Stewardship Initiative Performance Standards
- Indian Penal Code (Section 420, Cheating & Fraud)
- Companies Act 2013 (Section 447)
- Prevention of Corruption Act 1988
- SEBI (Listing Obligations and Disclosure Requirements)

9. Distribution and Annual Review

SSMI-AD's Fraud Prevention Policy is communicated through various channels to ensure widespread awareness and compliance. It is introduced during employee onboarding, included in vendor agreements, and shared with suppliers during briefings. Internally, it is accessible via the intranet, posted on notice boards, and integrated into training modules and compliance communications. Awareness campaigns and refresher sessions further reinforce its importance. For external stakeholders, it is shared through vendor portals and contractor onboarding materials. The policy is reviewed annually by the Compliance Officer and Internal Audit, incorporating audit findings, stakeholder feedback, legal updates, and emerging risks to maintain its effectiveness and relevance.

10. Disciplinary Action for Violators

Violations of this policy—such as committing fraud, failing to report fraudulent activity, or obstructing an investigation—will trigger strict disciplinary measures. These include immediate termination of employment or third-party contracts, legal action in accordance with applicable local and international laws, and recovery of financial losses incurred. For severe breaches, criminal prosecution may be pursued. Employees and business partners are held accountable for upholding the principles outlined in this policy. Disciplinary action is applied fairly and consistently, reinforcing SSMI-AD's zero-tolerance stance on fraud and its commitment to upholding ethical standards across all functions, geographies, and levels of the organization.

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11. Reporting Mechanism

SSMI-AD provides a robust, confidential whistleblower system to report suspected fraud, unethical conduct, or policy violations. Employees and stakeholders can report via secure email, a dedicated hotline, or anonymous dropboxes located at key facilities. All reports are acknowledged, logged, and escalated to the Compliance Committee for prompt investigation. SSMI-AD enforces a strict non-retaliation policy to protect individuals making good-faith disclosures from any form of victimization. Investigations are conducted impartially, and findings are documented. This mechanism ensures early detection, promotes accountability, and empowers employees and partners to act responsibly in safeguarding the company's integrity and long-term sustainability.

12. Conclusion

SSMI-AD is dedicated to upholding the highest standards of transparency, accountability, and ethical behavior across all its operations and supply chains. This fraud policy reinforces our zero-tolerance approach toward unethical practices and aligns with global ESG standards and legal obligations. By fostering a culture of vigilance, open communication, and shared responsibility, we aim to protect our people, assets, and reputation. All employees, contractors, and stakeholders are expected to actively support and adhere to the principles outlined in this policy. Through this collective commitment, SSMI-AD ensures the continuity of ethical governance and strengthens trust with customers, regulators, and society at large.

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17. Harassment Reporting System Policy

SSMI-AD/ESG/POLICY-17

1. Purpose

The purpose of this policy is to create a safe, confidential, and transparent system for reporting and addressing incidents of discrimination and harassment. It aligns with SSMI-AD's ESG values by fostering a respectful and inclusive workplace, ensuring all stakeholders feel protected, heard, and empowered to raise concerns without fear.

2. Scope of Application

This policy applies to all employees, contract workers, interns, trainees, suppliers, customers, and community stakeholders associated with SSMI-AD. It covers all business areas including manufacturing, supply chain, procurement, warehousing, administration, and support services. The geographical scope includes all SSMI-AD operational locations across India and any international sites where SSMI-AD may expand in the future.

3. Governance

The Grievance Redressal Committee (GRC), led by the ESG Officer and supported by members from HR, Ethics & Compliance, and Legal, is responsible for overseeing complaint resolution. It ensures non-retaliation, maintains confidentiality, and conducts regular training sessions and audits to promote awareness, accountability, and continuous improvement in grievance management.

4. Definition of Terms

✿ Discrimination

Discrimination involves treating individuals unfairly or unequally based on attributes such as race, caste, gender, age, disability, religion, marital status, or other protected characteristics. It undermines workplace equity and violates human rights. SSMI-AD prohibits all forms of discriminatory behavior across its operations and supply chain.

✿ Harassment

Harassment includes any unwelcome behavior—verbal, physical, sexual, or psychological—that causes offense, humiliation, or intimidation. It may occur between colleagues, superiors, subordinates, or third parties. SSMI-AD maintains a zero-tolerance stance toward all forms of harassment and prioritizes a respectful, safe, and inclusive workplace culture.

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Grievance Mechanism

A grievance mechanism is a structured process for employees and external stakeholders to report concerns confidentially and safely. It includes anonymous reporting options, timely investigations, and protection from retaliation. At SSMI-AD, this mechanism ensures that every complaint related to discrimination or harassment is heard, assessed, and resolved fairly.

5. Roles and Responsibilities

Employees

Employees are responsible for promptly reporting any incidents of discrimination or harassment they experience or witness. They are encouraged to use the grievance mechanism without fear of retaliation and must cooperate in investigations when requested. Their active participation is vital to fostering a safe, respectful, and inclusive work environment at SSMI-AD.

Supervisors/Managers

Supervisors and managers must respond to grievances seriously and escalate them to the HR Department or Grievance Redressal Committee (GRC) without delay. They are accountable for creating a non-retaliatory environment and must support employees throughout the grievance resolution process, reinforcing SSMI-AD's commitment to dignity, equity, and workplace justice.

HR Department

The HR Department is responsible for maintaining accurate grievance records, ensuring confidentiality, and facilitating fair resolution processes. They must also conduct regular awareness and training sessions and provide logistical and administrative support to the GRC. HR plays a key role in driving policy compliance and institutional accountability at SSMI-AD.

Grievance Redressal Committee

The Grievance Redressal Committee (GRC) investigates complaints with impartiality and confidentiality. It ensures timely resolution, prevents retaliation, and upholds workplace fairness. The committee also conducts root cause analysis, recommends corrective actions, and monitors systemic issues to improve grievance management and promote a culture of respect and justice at SSMI-AD.

Vendors/Subcontractors

Vendors and subcontractors must adopt grievance mechanisms aligned with SSMI-AD's standards and report any major complaints involving discrimination or harassment that affect SSMI-AD operations. They are expected to ensure safe reporting for their workers, cooperate during investigations, and maintain transparency and ethical conduct across their operations and supply chains.

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6. Harassment Reporting System Policy

6.1 Equitable Access to Career Growth

At SSMI-AD, we ensure that all employees—regardless of background, identity, or role—have equal access to learning and advancement opportunities. Promotions are merit-based and transparent, with clear criteria communicated across all departments. Training programs, mentorship, and leadership development initiatives are offered equitably. Participation data is monitored to detect any exclusion of underrepresented groups. Employees are encouraged to provide feedback on career development access through regular surveys and grievance channels. By fostering equity in growth pathways, we aim to build a leadership pipeline that reflects the diversity of our workforce and upholds our core values of fairness and meritocracy.

6.2 Gender Safety Risks

SSMI-AD prioritizes the safety and dignity of all employees during commuting and accommodation, especially women and vulnerable groups. We provide secure transportation, particularly for night shifts, and ensure staff housing meets safety, hygiene, and privacy standards. Complaint mechanisms for transport or accommodation issues are in place and monitored. Regular audits and feedback surveys assess the effectiveness of these services. Security personnel are trained in gender sensitivity, and emergency response protocols are in place. These efforts reflect our commitment to a safe and respectful environment both inside and outside the workplace, enhancing overall employee wellbeing.

6.3 Bias in Recruitment

SSMI-AD implements inclusive recruitment practices to prevent any bias related to caste, gender, age, disability, or background. Blind resume screening, structured interviews, and diversity-focused hiring goals are employed to ensure fairness in candidate selection. Hiring teams are trained to recognize and counter unconscious bias. Job postings use inclusive language, and interview panels reflect gender and cultural diversity. We monitor recruitment outcomes to ensure all demographic groups have equal access to opportunities. By embedding equity into our hiring process, we foster a workforce that reflects the richness of the communities we serve and promotes innovation through diversity.

6.4 Wage Practices

SSMI-AD ensures fair and equal compensation for all employees based on the principle of “equal pay for equal work.” We conduct regular wage audits to detect and correct any disparities based on gender, caste, or job category. Salary structures and performance incentives are transparently communicated, and all changes are documented and approved through a fair review process. Employees have the right to raise wage-related concerns through our grievance channels. Any discriminatory practices discovered are promptly investigated and corrected. Our goal is to maintain a pay structure rooted in equity, merit, and market standards.

6.5 Proper Grievance Handling

SSMI-AD recognizes that improperly handled harassment cases can severely harm individuals and organizational integrity. All complaints of harassment are investigated by trained professionals using standardized protocols that ensure neutrality, confidentiality, and fairness.

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We set strict timelines for investigation and resolution, and ensure victims are protected during and after the process. Our internal investigators undergo regular training on gender sensitivity, legal frameworks, and trauma-informed response. Review mechanisms and case audits are conducted periodically to ensure consistency and accountability in outcomes. We aim to uphold the rights and dignity of all stakeholders throughout the investigation process.

6.6 Sexual Harassment at Workplace

At SSMI-AD, we enforce a zero-tolerance policy toward any form of sexual harassment, in alignment with the POSH (Prevention of Sexual Harassment) Act. Our Internal Committee (IC) operates independently and maintains full confidentiality, ensuring all complaints are addressed with sensitivity and speed. We provide mandatory POSH training to all employees and maintain accessible reporting channels. Victims are supported throughout the resolution process, and any retaliation against complainants is strictly prohibited. By fostering a respectful work environment, we aim to create a culture of safety, dignity, and mutual respect, where everyone—regardless of gender—feels secure and empowered to speak up.

6.7 Retaliation Against Whistleblowers

SSMI-AD maintains a strict Non-Retaliation Policy to protect individuals who report unethical behavior, human rights violations, or any form of misconduct. Retaliation in any form—whether direct or indirect—is not tolerated and will lead to disciplinary action, including termination if necessary. Employees are regularly informed about their right to report freely and confidentially. Our governance structure ensures that whistleblowers are safeguarded throughout the investigation process. Anonymous reporting mechanisms are available and promoted. By creating a culture where accountability and integrity are valued, we empower employees and external stakeholders to come forward without fear of backlash.

6.8 Harassment of Disabled Workers

SSMI-AD is dedicated to fostering an inclusive environment where persons with disabilities feel respected, supported, and empowered. We provide reasonable accommodations such as accessible workspaces, assistive technologies, and flexible work arrangements. Discriminatory behavior, mockery, or exclusion targeting disabled employees is not tolerated. Awareness sessions are conducted to educate staff on ableism and inclusive etiquette. Grievances involving disability-related issues are handled with extra sensitivity and urgency. Our inclusion policies go beyond compliance—they reflect our belief that diversity in ability is an asset and that all employees must have equal access to opportunity and dignity at work.

6.9 Safety Lapses

SSMI-AD acknowledges that individuals may face multiple, overlapping forms of discrimination—for example, based on gender, caste, and disability. Our grievance redressal system is equipped to handle intersectional complaints with the sensitivity and nuance they require. Investigators are trained in intersectionality, ensuring a comprehensive and fair approach. Victim support services consider the compounded impact of such experiences. Case analysis includes root cause evaluation to prevent recurrence. By recognizing and addressing these layered challenges, we reinforce our commitment to a workplace that respects all identities and acknowledges the complexity of lived experiences.

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6.10 Reporting Language Obstacles

Recognizing the linguistic diversity of our workforce, SSMI-AD ensures that grievance mechanisms are available in multiple regional languages. Complaint forms, hotline instructions, and guidance materials are translated to support accessibility. Support staff and grievance officers are trained in regional languages and cultural sensitivity. Translation tools and multilingual signage are available at all sites. We regularly test the clarity and usability of translated materials to avoid misinterpretation or exclusion. Through these efforts, we eliminate language as a barrier to justice, ensuring all employees—regardless of linguistic background—can freely and confidently report concerns.

6.11 Complaint Process Barriers

SSMI-AD is committed to ensuring that all employees and stakeholders have safe, confidential, and accessible channels for raising grievances. We provide multiple formats for submission—online, in-person, anonymous, and in local languages—to ensure inclusivity across different literacy levels and job roles. We regularly assess the reach and usability of these channels and provide awareness training on how to use them. All complaints are reviewed by the Grievance Redressal Committee in a timely manner. Our aim is to build a culture of trust where every voice is heard, and every concern is acted upon fairly and transparently.

6.12 Equity in Treatment

SSMI-AD is firmly committed to an inclusive workplace where no individual is disadvantaged based on caste, gender, religion, ethnicity, or other identity. We uphold the constitutional right to equality and prohibit any discriminatory practices in hiring, wages, promotions, or workplace behavior. Regular audits and employee feedback mechanisms ensure fair treatment across all business operations. Awareness programs and bias mitigation training are provided to prevent conscious or unconscious prejudice. Any instance of discrimination is addressed swiftly through our grievance redressal system, ensuring corrective and disciplinary measures are taken while maintaining confidentiality and respect for all parties involved.

6.13 Human Rights Omissions

To uphold our human rights standards across the value chain, SSMI-AD requires all vendors and suppliers to adopt policies prohibiting discrimination and harassment. These policies must align with our ethical standards and be effectively communicated to their workforce. As part of our due diligence, vendors are regularly assessed through audits, questionnaires, and site visits. Contracts include human rights compliance clauses, and vendors found violating these terms face review, remediation mandates, or termination. We also offer guidance and training to help vendors improve their practices. Our aim is to build a supply chain rooted in respect, equality, and accountability.

6.14 Community Grievance Barriers

SSMI-AD believes that communities affected by our operations should have a voice in how we conduct our business. We have established dedicated community reporting channels, including helplines, suggestion boxes, and appointed local liaisons. Community members can report concerns anonymously or directly to our outreach team. We log and resolve all concerns transparently, providing updates to complainants where possible.

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These mechanisms are promoted during public engagements and community meetings. By enabling open dialogue with the community, we build trust, address potential harms proactively, and strengthen our social license to operate.


6.15 Community Impact Concerns

SSMI-AD is committed to conducting its business in a manner that respects the rights and dignity of local communities. We actively engage with affected communities during land use, facility expansion, or any disruptive operations. Open forums, public consultations, and social impact assessments are conducted before initiating such activities. We ensure no forceful displacement, harassment, or indirect harm arises from our presence or expansion. Any community grievances are addressed through designated local liaisons and documented transparently. By fostering dialogue and mutual respect, we aim to coexist peacefully and contribute positively to the communities we operate in.

7. ESG Objectives

- Sustainability Issue** : **Equitable Access to Career Growth**
Objective : Ensure equal career development opportunities
Measure : % employees with access to career progression plans
Target Value : ↑ 85%
- Sustainability Issue** : **Gender Safety Risks**
Objective : Strengthen workplace safety for all genders
Measure : % implementation of gender safety audits
Target Value : ↑ 100%
- Sustainability Issue** : **Bias in Recruitment**
Objective : Eliminate bias in hiring practices
Measure : % recruitments through structured, bias-free process
Target Value : ↑ 65%
- Sustainability Issue** : **Wage Practices**
Objective : Ensure equal pay for equal work
Measure : % roles with verified wage parity
Target Value : ↑ 75%
- Sustainability Issue** : **Proper Grievance Handling**
Objective : Improve fairness and responsiveness in grievance redressal
Measure : % grievances resolved within 30 days
Target Value : ↑ 80%

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6. Sustainability Issue

: Sexual Harassment at Workplace

Objective

: Prevent and respond to sexual harassment cases

Measure

: % staff trained on POSH

Target Value

: ↑ 100%

7. Sustainability Issue

: Retaliation Against Whistleblowers

Objective

: Protect whistleblowers from retaliation

Measure

: % whistleblower cases with no retaliation reported

Target Value

: ↑ 85%

8. Sustainability Issue

: Harassment of Disabled Workers

Objective

: Prevent discrimination against differently-abled staff

Measure

: % reported cases addressed promptly

Target Value

: ↑ 65%

9. Sustainability Issue

: Safety Lapses

Objective

: Ensure inclusive safety measures for all employees

Measure

: % safety protocols adapted for inclusivity

Target Value

: ↑ 75%

10. Sustainability Issue

: Reporting Language Obstacles

Objective

: Remove language barriers in complaint reporting

Measure

: % grievance systems with multilingual support

Target Value

: ↑ 70%

11. Sustainability Issue

: Complaint Process Barriers

Objective

: Simplify and streamline complaint submission

Measure

: % complaints submitted via simplified channels

Target Value

: ↑ 65%

12. Sustainability Issue

: Inequity in Treatment

Objective

: Ensure fair treatment across all demographics

Measure

: % employees reporting equitable workplace experience

Target Value

: ↑ 60%

13. Sustainability Issue

: Human Rights Omissions

Objective

: Embed human rights principles across operations

Measure

: % compliance with internal human rights policies

Target Value

: ↑ 60%

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14. Sustainability Issue

: Community Grievance Barriers

Objective

: Enable community members to voice concerns

Measure

: % community grievances addressed

Target Value

: ↑ 90%

15. Sustainability Issue

: Community Impact Concerns

Objective

: Identify and mitigate adverse community impacts

Measure

: No. of impact assessments conducted

Target Value

: ↑ 1/year

8. Applicable Standards, Laws, Acts

- POSH Act 2013 (Sexual Harassment)
- Equal Remuneration Act, 1976
- Rights of Persons with Disabilities Act, 2016
- SC/ST (Prevention of Atrocities) Act
- SA8000: Non-discrimination, disciplinary practices
- UN Global Compact: Principles 1, 2, 6
- OECD Guidelines: Human rights and due diligence
- GRI 406: Non-discrimination
- ASI Performance Standard: Human rights due diligence and grievance mechanisms

9. Distribution and Annual Review

SSMI-AD ensures effective communication and accessibility of its Discrimination and Harassment Grievance Policy through multiple channels. The policy is shared during employee onboarding, displayed on notice boards at all operational sites, and made available in English and regional languages for inclusivity. Suppliers are informed of the grievance mechanism and must adhere to its principles contractually. Annual refresher workshops reinforce awareness and promote a culture of openness. The policy is reviewed annually by the Grievance Redressal Committee, HR, and ESG teams, incorporating legal updates, grievance trends, stakeholder feedback, and global ESG standards. This ensures continuous improvement and organizational accountability.

10. Disciplinary Action for Violators

Violations of this policy—such as acts of discrimination, harassment, retaliation, or deliberate failure to report known incidents—will invoke strict disciplinary action. Depending on the severity of the violation, consequences include formal written warnings, suspension, termination of employment or contract, and, where warranted, legal prosecution. For external stakeholders such as vendors and contractors, non-compliance may result in contract termination or blacklisting.

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These actions demonstrate SSMI-AD’s zero-tolerance approach and serve as a deterrent to misconduct. Enforcement of these measures ensures accountability, reinforces organizational values, and protects the integrity of SSMI-AD’s work environment and its broader ESG commitments.

11. Reporting Mechanism

SSMI-AD offers a range of secure and accessible reporting channels including email, grievance drop boxes, a confidential hotline, a digital web portal, and in-person walk-in options. These are available in multiple formats and languages, with special accommodations for marginalized or differently-abled individuals to ensure equal access. All grievances are handled with strict confidentiality, and anonymous reporting is permitted unless disclosure is mandated by law. Retaliation against complainants or witnesses is strictly prohibited, with sanctions clearly outlined. The grievance procedure includes acknowledgment within 7 days and resolution within 30 days, reflecting SSMI-AD’s commitment to swift, fair, and respectful handling of complaints.

12. Conclusion

SSMI-AD is steadfast in its mission to foster a workplace that is inclusive, equitable, and free from all forms of discrimination and harassment. Through this comprehensive grievance mechanism, embedded within our ESG framework, we empower all stakeholders to voice concerns without fear. The policy is aligned with Indian labor laws and international human rights standards, underscoring our commitment to justice, transparency, and employee dignity. By actively encouraging dialogue and addressing concerns responsibly, SSMI-AD promotes a culture of trust and accountability—ensuring every individual is respected, valued, and protected across all levels of our operations and partnerships.

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18. Air Quality Control Policy

SSMI-AD/ESG/POLICY-18

1. Purpose

This policy outlines SSMI-AD's commitment to preventing, reducing, and managing air pollution and non-GHG atmospheric emissions, including particulate matter, dust, SO_x, NO_x, VOCs, and noise. The aim is to safeguard employee health, protect the local community, and comply with national and international environmental norms.

2. Scope of Application

This policy applies to all employees, environmental officers, plant operators, logistics partners, and contractors. It covers business areas including production, storage, raw material handling, waste disposal, and transportation operations. The geographical scope includes all manufacturing units and operational facilities of SSMI-AD located across India.

3. Governance

Air quality and emissions at SSMI-AD are governed by the Air Quality & Emissions Committee, chaired by the Head of EHS. The committee ensures monthly monitoring of air quality parameters and prepares annual compliance reports for management and authorities. Cross-functional collaboration between operations, maintenance, and sustainability teams ensures integrated decision-making and effective implementation of emission control measures.

4. Definitions

✿ Particulate Matter (PM)

Particulate Matter includes tiny airborne solid particles released during smelting, grinding, or material handling operations. These can originate from dust, ash, or combustion residues. PM poses significant health risks when inhaled, causing respiratory and cardiovascular issues. SSMI-AD employs dust suppression systems, bag filters, and enclosure techniques to limit PM emissions, ensuring worker safety and compliance with air quality norms across all operational areas.

✿ VOCs (Volatile Organic Compounds)

VOCs are hazardous air pollutants emitted from fuels, solvents, paints, and chemical processes. These organic gases contribute to smog formation and can affect human health, causing headaches, liver damage, or even cancer with prolonged exposure. SSMI-AD mitigates VOC emissions by using low-VOC products, ensuring proper storage, enhancing ventilation, and installing activated carbon filters to capture and treat vapors at source across manufacturing units.

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✿ SOx/NOx (Sulfur Oxides and Nitrogen Oxides)

SOx and NOx are harmful gases produced from fossil fuel combustion in furnaces, boilers, or generators. These pollutants cause acid rain, respiratory diseases, and environmental degradation. SSMI-AD addresses SOx/NOx emissions through cleaner fuels, low-NOx burners, process optimization, and emission scrubbing systems. Continuous emissions monitoring ensures that levels remain within permissible limits as set by national air quality and environmental protection regulations.

✿ Red Mud

Red Mud is a by-product of alumina refining from bauxite and can release airborne particulates if not managed properly. When dry, this fine, alkaline waste poses risks to air quality and human health through wind dispersal or chemical reactions. SSMI-AD ensures safe handling of red mud via wet disposal, covered storage, and stabilization techniques, preventing airborne release and minimizing environmental impact from this hazardous industrial residue.

✿ Non-GHG Emissions

Non-GHG emissions include pollutants like PM, VOCs, SOx, NOx, and other hazardous air contaminants not categorized under greenhouse gases but with serious local health and environmental impacts. These emissions degrade ambient air quality and may cause acute and chronic health effects. SSMI-AD actively monitors and controls non-GHG emissions through engineered controls, real-time detection systems, and adherence to national clean air guidelines and industry-specific emission norms.

5. Roles and Responsibilities

✿ Top Management

Top Management is responsible for setting and approving air quality standards aligned with regulatory norms and sustainability goals. They allocate financial and human resources for pollution control technologies, monitoring systems, and training. Their leadership ensures that air quality management is integrated into strategic planning and environmental governance at SSMI-AD.

✿ EHS Team

The EHS (Environment, Health, and Safety) Team conducts regular air quality assessments, ensures compliance with national emission standards, and maintains pollution control equipment. They coordinate audits, analyze emissions data, and recommend improvements. Their oversight ensures workplace safety, environmental protection, and adherence to the company's air emissions management framework and reporting protocols.

✿ Operations Team

The Operations Team implements day-to-day emission control procedures, operates air pollution control devices, and ensures compliance with prescribed environmental norms. They monitor process parameters, maintain equipment like bag filters or scrubbers, and report deviations promptly. Their role is critical in minimizing particulate, gaseous, and other airborne pollutants during manufacturing.

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Employees

Employees must wear appropriate Personal Protective Equipment (PPE), follow safe material handling and ventilation protocols, and comply with air pollution control procedures. They are expected to report any dust, fume, or gas emission incidents immediately. Their active participation contributes to a clean, healthy, and compliant work environment across all facilities.

Contractors

Contractors working on SSMI-AD premises are required to follow the company's air quality and pollution control guidelines. They must attend mandatory training sessions, use emission-safe practices, and cooperate with inspections. Ensuring contractor compliance helps maintain consistent environmental standards and prevents air pollution from third-party operations and maintenance activities.

6. Air Quality Control Policy

6.1 Noise Pollution from Industrial Equipment

Industrial operations at SSMI-AD generate significant noise from machinery, compressors, and vehicular activity. To mitigate this, SSMI-AD will employ noise-dampening enclosures, acoustic barriers, and schedule high-noise tasks during daytime to reduce disturbances to nearby communities. Noise exposure levels will be monitored at the factory boundary and inside work zones. Workers will be provided with hearing protection equipment, and training will be conducted on safe practices. By integrating noise reduction into operational planning, SSMI-AD aims to maintain a safe working environment and promote community well-being by adhering to occupational and ambient noise regulations.

6.2 VOC Reduction Technologies

To minimize harmful air emissions, SSMI-AD has implemented advanced pollution control technologies such as wet scrubbers, vapor recovery systems, activated carbon filters, and hermetically sealed chemical storage tanks. These systems are integrated into melting, casting, and chemical handling operations to capture and neutralize emissions at the source. Emphasis is placed on continuous equipment maintenance, emission source isolation, and real-time monitoring. Our commitment to emission control helps safeguard employee health, ensures compliance with emission standards, and aligns with our broader ESG goals of reducing the environmental impact of industrial operations across all manufacturing units.

6.3 Congestion Reduction Strategies

SSMI-AD ensures smooth logistics by strategically scheduling transportation activities during non-peak hours to reduce road congestion around its facilities. A digital traffic management system helps optimize vehicle flow, reduce idle time, and prevent bottlenecks. Clearly marked loading zones, trained drivers, and designated routes further contribute to traffic decongestion and improved site accessibility. Onsite marshals are deployed during peak delivery periods to manage traffic and ensure safety. By implementing these practices, SSMI-AD not only maintains regulatory compliance but also minimizes the environmental and social impact of transport operations on local communities and surrounding infrastructure.

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6.4 Red Mud and Hazardous Residue Emissions

Red mud, a byproduct of bauxite refining, can release toxic particulates or leach harmful substances if not properly managed. SSMI-AD will implement engineered containment systems such as lined storage ponds and covered silos to securely manage red mud and hazardous residues. Regular monitoring will ensure that airborne dust levels remain controlled in and around storage areas. Periodic inspections will verify structural integrity, and measures like land capping or vegetation will reduce dispersal. The company also promotes sustainable reuse of red mud in industrial or construction applications, minimizing environmental impact while adhering to national hazardous waste management guidelines.

6.5 Ambient Air Assessment

SSMI-AD conducts regular monitoring of ambient air quality and source emissions to assess concentrations of major pollutants, including PM, SO₂, NO_x, VOCs, and trace heavy metals. Monitoring stations are strategically located along site boundaries to capture representative data. These efforts enable SSMI-AD to evaluate environmental performance, maintain compliance with CPCB and international norms, and initiate early interventions when required. Quarterly reports are reviewed by the EHS team and shared with management for transparency and accountability. The data also informs long-term air quality planning and supports continuous process improvements aimed at reducing overall emissions.

6.6 Fume Generation Sources

SSMI-AD acknowledges the harmful impact of particulate matter (PM), dust, and fumes generated during smelting, sintering, and ingot casting processes. The company is committed to installing advanced fume extraction and dust suppression technologies across all high-emission zones. Regular air quality assessments will be conducted to monitor PM_{2.5} and PM₁₀ concentrations, ensuring they remain within permissible limits. Employee health is a top priority, and periodic medical screenings will be implemented to detect respiratory issues early. SSMI-AD will also conduct ongoing maintenance of extraction systems and collaborate with experts to continually improve workplace air quality and protect nearby communities.

6.7 Operational Noise Control

SSMI-AD takes proactive steps to reduce industrial noise by integrating engineering controls across high-noise zones. Acoustic enclosures are installed around heavy machinery, soundproof panels line site boundaries, and mufflers are used on pneumatic equipment. Noise-insulated production rooms reduce the impact on both internal staff and external communities. Routine inspections ensure that noise control systems function optimally. Employees working in noisy areas are provided with hearing protection and trained on noise hazard awareness. These measures help SSMI-AD create a safer and quieter working environment and uphold its commitment to community well-being and compliance with occupational safety norms.

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6.8 Roadway Emission Risks

Heavy traffic from the transport of raw materials and finished goods contributes to emissions and local road congestion. SSMI-AD will adopt logistics strategies that include route optimization, scheduled deliveries, and vehicle maintenance to reduce CO₂ and NO_x emissions. Priority will be given to deploying fuel-efficient and low-emission vehicles. Coordination with local authorities will ensure minimal disruption to residential areas. The company also encourages shared logistics solutions to reduce trip frequency. By streamlining supply chain logistics, SSMI-AD reduces its environmental footprint and strengthens community relations through lower emissions and less road traffic.

6.9 Environmental Emission Prevention

SSMI-AD is dedicated to minimizing atmospheric emissions and environmental nuisances by integrating advanced pollution control systems, adopting energy-efficient technologies, and upgrading operational processes. We focus on reducing the release of dust, particulate matter (PM), volatile organic compounds (VOCs), sulfur dioxide (SO₂), and nitrogen oxides (NO_x). Additionally, noise, odor, and traffic-related nuisances are managed through structured preventive maintenance, improved logistics, and stakeholder engagement. Through continuous improvement, we maintain regulatory compliance and protect public health and environmental quality. Our approach is proactive and inclusive, involving employees, suppliers, and communities in our mission to operate responsibly and sustainably.

6.10 Light and Odor Pollution from Operations

Uncontrolled lighting and industrial odors can lead to discomfort and complaints from neighboring communities. SSMI-AD will install shielded and directional lighting to reduce glare and prevent light pollution beyond site boundaries. For odor management, all chemical handling and waste processing areas will be enclosed and equipped with proper ventilation systems. Regular checks and maintenance of storage units will ensure no odor leaks. Community engagement will help in identifying sources of discomfort early. These initiatives contribute to a healthier environment and reflect SSMI-AD's commitment to being a responsible neighbor while maintaining operational excellence.

6.11 Emission Odor Management

To prevent odor-related nuisances, SSMI-AD adopts multiple odor control strategies tailored to its operations. Chemicals and volatile materials are stored in closed, ventilated systems to reduce odor release. Carbon filters are installed in ventilation systems, especially in odor-sensitive zones. Regular inspections and timely removal of decomposable or odorous substances ensure containment before dispersion. Operations involving organic or high-odor compounds are reviewed periodically to identify improvement opportunities. These efforts are crucial in maintaining a clean, safe, and comfortable environment for workers and nearby residents, enhancing SSMI-AD's reputation for responsible and community-friendly industrial practices.

6.12 Chemical Storage Emissions

Volatile Organic Compounds (VOCs) are released from solvents, chemicals, and fuel storage areas, posing health risks and contributing to atmospheric smog. SSMI-AD will mitigate VOC emissions through sealed chemical containers, vapor recovery units, and proactive leak detection and repair programs. Where possible, low-VOC alternatives will be adopted in operations. Employees involved in handling chemicals will receive training in safe storage practices.

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By maintaining strict controls over chemical inventories and infrastructure integrity, SSMI-AD ensures reduced emissions, enhanced indoor air quality, and compliance with environmental norms related to hazardous substances and worker exposure to harmful airborne chemicals.

6.13 Particulate Filtration Systems

To manage particulate matter (PM) emissions effectively, SSMI-AD uses modern technologies such as baghouse filters, dust suppression systems, and local exhaust ventilation. These are strategically installed across high-dust zones to capture particles at the source. Structured cleaning routines and routine equipment maintenance prevent accumulation and resuspension of fine particles. Operators are trained to manage dust control procedures efficiently, and process areas are regularly inspected for fugitive emissions. Our systematic approach ensures a safe and healthy workplace while minimizing the impact of airborne particulates on neighboring communities and ecosystems, in line with national and international environmental regulations.

6.14 Industrial Combustion Pollutants

Combustion of fossil fuels in industrial processes leads to the release of sulfur oxides (SO_x) and nitrogen oxides (NO_x), major contributors to air pollution and acid rain. SSMI-AD will transition to cleaner-burning fuels like LPG and natural gas while phasing out high-sulfur fuel sources. Stack emissions will be continuously monitored using real-time systems to ensure compliance with legal standards. Routine maintenance and tuning of combustion systems will be carried out to optimize efficiency and emission reduction. By adopting best practices in fuel management, SSMI-AD aims to reduce its environmental footprint and enhance workplace and community health outcomes.

6.15 Enclosed Transfer Circuits

SSMI-AD ensures all cement and powder aggregate handling systems are fully enclosed to prevent ambient dust emissions and material loss. Conveyor belts are sealed with dust-tight enclosures and equipped with inspection hatches for safe maintenance. Containers and hoppers used for storing or transporting powders are hermetically sealed to prevent spillage and protect worker health. Automated transfer systems reduce manual handling and exposure risks. These sealed systems form a critical part of SSMI-AD's air quality control strategy, enabling cleaner operations, improved efficiency, and safer working conditions across all production lines involving fine particulate materials.

6.16 Regular Sound Assessment


SSMI-AD conducts quarterly noise monitoring campaigns at key locations around the facility, especially near site boundaries and noise-sensitive zones. The goal is to ensure that operational sound levels comply with statutory noise thresholds and do not adversely affect nearby communities or wildlife. Measurements are carried out during peak and non-peak hours for accuracy and trend analysis. Any exceedances prompt immediate corrective actions, such as equipment modifications or additional insulation. This systematic approach allows us to uphold our environmental responsibility while maintaining transparent engagement with regulatory authorities and stakeholders regarding noise emissions and mitigation efforts.

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7. ESG Objectives

- Sustainability Issue** : **Noise Pollution from Industrial Equipment**
Objective : Reduce noise levels from machinery operations
Measure : dB reduction in equipment zones
Target Value : ↓ 10%
- Sustainability Issue** : **VOC Reduction Technologies**
Objective : Minimize volatile organic compound emissions
Measure : % VOC reduction through control systems
Target Value : ↑ 60%
- Sustainability Issue** : **Congestion Reduction Strategies**
Objective : Lower traffic-related emissions in plant vicinity
Measure : % decrease in vehicle idle time
Target Value : ↓ 15%
- Sustainability Issue** : **Red Mud and Hazardous Residue Emissions**
Objective : Prevent airborne release of hazardous residues
Measure : % containment of emissions
Target Value : ↑ 100%
- Sustainability Issue** : **Ambient Air Assessment**
Objective : Monitor and maintain safe air quality standards
Measure : No. of ambient air quality tests conducted
Target Value : ↑ 6
- Sustainability Issue** : **Fume Generation Sources**
Objective : Control fume emissions from key processes
Measure : % fume sources with capture systems
Target Value : ↑ 100%
- Sustainability Issue** : **Operational Noise Control**
Objective : Implement operational noise reduction measures
Measure : % noisy zones with sound barriers or insulation
Target Value : ↑ 60%

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| <p>8. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Roadway Emission Risks</p> <p>: Minimize emissions from on-site transport</p> <p>: % shift to electric or low-emission vehicles</p> <p>: ↑ 15%</p> |
| <p>9. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Environmental Emission Prevention</p> <p>: Prevent unintentional pollutant releases</p> <p>: % emission sources with preventive controls</p> <p>: ↑ 95%</p> |
| <p>10. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Light and Odor Pollution from Operations</p> <p>: Reduce operational impact on surrounding environment</p> <p>: % reduction in complaints received</p> <p>: ↓ 25%</p> |
| <p>11. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Emission Odor Management</p> <p>: Control and neutralize process odors</p> <p>: % odor mitigation systems implemented</p> <p>: ↑ 100%</p> |
| <p>12. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Chemical Storage Emissions</p> <p>: Prevent vapor emissions from chemical storage</p> <p>: % chemical storage units with vapor controls</p> <p>: ↑ 100%</p> |
| <p>13. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Particulate Filtration Systems</p> <p>: Filter out airborne particulates from operations</p> <p>: % air outlets equipped with filtration</p> <p>: ↑ 85%</p> |
| <p>14. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Industrial Combustion Pollutants</p> <p>: Reduce pollutants from combustion processes</p> <p>: % reduction in NOx and SOx emissions</p> <p>: ↓ 15%</p> |
| <p>15. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Enclosed Transfer Circuits</p> <p>: Prevent emission leakage during material transfer</p> <p>: % material transfers in enclosed systems</p> <p>: ↑ 80%</p> |

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16.Sustainability Issue	: Regular Sound Assessment
Objective	: Monitor and control industrial noise exposure
Measure	: No. of sound level surveys conducted
Target Value	: ↑ 2

8. Applicable Standards, Laws, and Acts

- ISO 14001: Environmental Management System
- Global Reporting Initiative (GRI 305, 306)
- Aluminum Stewardship Initiative (ASI) – Environmental Performance
- UN Global Compact – Environmental Responsibility (Principle 9)
- OECD Guidelines for Multinational Enterprises
- India's Air (Prevention and Control of Pollution) Act, 1981
- Environment Protection Act, 1986 (India)
- National Ambient Air Quality Standards (NAAQS)
- CPCB/State Pollution Control Board Guidelines

9. Distribution and Annual Review

SSMI-AD ensures full awareness and implementation of its Air Pollution ESG Policy by distributing it across all departments and external contractors. Accessible via the internal portal and ESG dashboard, the policy is integrated into EHS induction and vendor onboarding. Awareness is further promoted through internal newsletters and posters. Reviewed annually by ESG and EHS teams, the policy incorporates audit findings, environmental data, regulatory updates, and stakeholder input. Revisions reflecting technological or legal changes are approved by the ESG Committee and shared with senior management. This ensures the policy remains current, effective, and aligned with sustainability goals and compliance requirements.

10. Disciplinary Action for Policy Violators

SSMI-AD maintains a zero-tolerance approach toward non-compliance with air pollution control measures. Employees or contractors who violate the policy may face disciplinary actions ranging from verbal or written warnings to removal from critical roles. In cases of serious or repeated non-compliance, vendors or third parties may face contract suspension or termination. If violations result in breaches of regulatory laws, the matter may be reported to the appropriate legal authorities. These measures serve as a deterrent and reinforce the importance of accountability in maintaining air quality standards across all SSMI-AD operations and stakeholder engagements.

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11. Reporting Mechanism

SSMI-AD encourages open communication and transparency in reporting air pollution concerns. Employees, vendors, and community members can report incidents or suspected violations through multiple channels, including an online portal, a dedicated ESG hotline, or internal incident report forms. Reports are handled confidentially and are investigated by the EHS team within 5–7 working days. Where necessary, corrective actions are implemented promptly. Feedback is also provided to the reporter to close the communication loop. This inclusive reporting mechanism empowers stakeholders to contribute to air quality improvements and ensures swift response to potential risks or issues.

12. Conclusion

The Air Pollution ESG Policy reflects SSMI-AD's unwavering commitment to environmental stewardship, occupational safety, and community well-being. By proactively reducing emissions, enhancing monitoring systems, and engaging employees and partners, we aim to exceed compliance and set a benchmark in sustainable manufacturing. Our approach combines advanced technology, stakeholder collaboration, and continuous improvement to deliver cleaner air and safer environments. This policy supports our broader ESG mission and reaffirms SSMI-AD's role as a responsible corporate citizen committed to protecting the environment for current and future generations.

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19. Labor Conditions Management Policy

SSMI-AD/ESG/POLICY-19

1. Purpose

This policy aims to establish fair, equitable, and sustainable working conditions at SSMI-AD by promoting decent wages, safe work hours, inclusive benefits, employee well-being, and transparent communication. It aligns with our ESG commitment to invest in human capital while maintaining ethical and efficient production.

2. Scope of Application

This policy applies to all SSMI-AD employees, including permanent, contract, temporary, and migrant workers. It covers all business areas such as manufacturing, administrative, and supply chain operations. Geographically, the policy is applicable across all SSMI-AD facilities and operational locations throughout India, ensuring uniform implementation and compliance.

3. Governance

This policy is governed by SSMI-AD's ESG Committee in close collaboration with the Human Resources Department. Oversight responsibilities lie with senior management and compliance teams to ensure adherence to the policy and alignment with both national and international labor standards. Regular reviews and monitoring help maintain integrity, transparency, and continuous improvement in workforce-related practices.

4. Definitions

✿ Working Conditions

Working conditions encompass the physical and organizational environment in which employees perform their duties. This includes work hours, workplace safety, remuneration, benefits, and facilities. Ensuring fair and safe working conditions is crucial for employee well-being, productivity, and compliance with labor laws and ESG standards.

✿ Fair Wage

A fair wage refers to remuneration that not only meets statutory minimum wage requirements but also considers the cost of living and local standards. It ensures that employees can meet basic needs and maintain dignity. SSMI-AD promotes equitable compensation practices aligned with ethical labor standards and socio-economic benchmarks.

✿ Social Benefits

Social benefits include non-wage compensations such as health insurance, paid family leave, pension schemes, disability coverage, and wellness programs.

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These benefits support employee well-being and security, reinforcing a company's commitment to its workforce. SSMI-AD ensures all employees receive adequate social protection in line with legal and ESG commitments.

✿ Work-Life Balance

Work-life balance refers to an employee's ability to effectively manage work responsibilities alongside personal and family life. SSMI-AD promotes flexible work practices, regulated hours, and supportive policies to reduce stress and burnout, thereby improving productivity, morale, and long-term employee retention.

✿ Right to Disconnect

The right to disconnect ensures employees can disengage from work-related communications outside official working hours without fear of reprisal. This policy protects mental health, promotes rest, and respects personal time. SSMI-AD supports this right to foster a culture of respect, balance, and sustainable productivity.

5. Roles and Responsibilities

✿ HR Department

The HR Department is responsible for implementing this policy across the organization. It ensures effective communication to all employees, conducts training sessions, and monitors compliance. HR also handles records, tracks improvements, and coordinates with other departments to maintain fair working conditions aligned with legal and ESG standards.

✿ Supervisors/Managers

Supervisors and managers play a key role in ensuring that their teams comply with this policy. They are responsible for creating a respectful work environment, addressing grievances promptly, monitoring working conditions daily, and escalating issues to HR when necessary. They also support awareness and consistent application of the policy at the operational level.

✿ ESG Committee

The ESG Committee periodically reviews the policy to ensure it aligns with evolving ESG standards, national labor laws, and industry best practices. It evaluates feedback, conducts impact assessments, and updates the policy as needed. The committee ensures that sustainability and ethical labor practices are upheld across all operations.

✿ Employees

Employees are expected to understand, follow, and uphold the principles of this policy. They should engage in open communication, report any violations or concerns through appropriate channels, and contribute to a safe, respectful, and equitable workplace. Compliance by all employees is essential to maintaining a responsible and ethical work environment.

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6. Labor Conditions Management Policy

6.1 Transparent Salary Communication

SSMI-AD promotes transparency in compensation through clear communication of the remuneration system. Employees receive information on salary components, bonuses, and benefits during induction, performance reviews, and dedicated HR sessions. Salary bands and advancement criteria are shared openly, helping employees understand how compensation aligns with performance, seniority, and role changes. Regular workshops and policy updates ensure all employees stay informed about remuneration revisions or legislative changes. This transparent approach builds trust, reduces misunderstandings, and empowers employees to manage their career development. HR and management maintain open-door policies to clarify concerns and receive feedback on pay structure communications.

6.2 Excessive or Unregulated Working Hours

SSMI-AD strictly adheres to national and international regulations concerning working hours, rest days, and overtime. We recognize the risks posed by excessive workloads, including burnout, reduced productivity, and health hazards. Therefore, we limit working hours to 48 hours per week, ensure all overtime is voluntary and compensated, and promote a healthy work-life balance. Our “Right to Disconnect” policy reinforces employees’ right to rest outside of work hours. Managers are trained to monitor workloads and schedule rotations fairly. By protecting employee time and energy, we create a respectful and sustainable working environment aligned with labor rights principles.

6.3 Gender Inequality in Working Conditions

SSMI-AD is committed to eliminating gender-based disparities in hiring, promotion, pay, and workplace treatment. We enforce equal pay for equal work, implement gender-neutral job evaluations, and provide maternity and paternity leave benefits. Our anti-harassment policies and mandatory gender-sensitivity training ensure a respectful and inclusive workplace. We conduct regular audits to monitor gender representation at all levels and strive to close any gaps in opportunities and leadership roles. SSMI-AD also supports women returning to work after parental leave through reintegration programs. Our commitment to gender equality upholds fairness, enhances organizational performance, and supports a diverse and inclusive culture.

6.4 Adaptable Work Structures

SSMI-AD supports flexible working arrangements to accommodate diverse employee needs. Options such as flexible hours, compressed workweeks, remote work, and part-time schedules are offered, depending on the nature of the role. Employees can formally request such arrangements, which are evaluated by supervisors and HR to ensure operational feasibility while respecting personal needs. Flexible work enhances productivity, reduces commuting stress, and promotes inclusivity for employees with caregiving responsibilities or health needs. This approach also supports mental well-being, gender equity, and employee engagement. Policies on flexible work are clearly documented and communicated to ensure clarity and equal access for all.

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6.5 Work-Life Balance & Mental Health Impact

SSMI-AD actively promotes work-life balance as a cornerstone of our employee well-being strategy. We offer flexible work arrangements, mental health counseling, and Employee Assistance Programs (EAPs) to support psychological wellness. Our organizational culture encourages balance between professional and personal responsibilities, recognizing that mental well-being drives performance and sustainability. Initiatives such as stress management workshops, anonymous support lines, and proactive mental health campaigns are regularly conducted. We also ensure policies like the “Right to Disconnect” are implemented across departments. By valuing emotional resilience and personal time, SSMI-AD fosters a more engaged, loyal, and productive workforce.

6.6 Adequate Wages & Inflation Mismatch

SSMI-AD is committed to providing fair, equitable, and competitive compensation to all employees. Our wage structure exceeds the statutory minimum and is adjusted regularly to reflect inflation, cost-of-living changes, and industry benchmarks. We align our compensation framework with ILO standards and conduct annual wage reviews to ensure transparency and fairness. Pay parity across roles and genders is actively monitored, and wage-related grievances are addressed promptly through structured channels. By offering wages that support a dignified standard of living, SSMI-AD supports employee well-being, enhances retention, and demonstrates our commitment to social responsibility and economic justice in our operations.

6.7 Workload Compensation Plan

SSMI-AD recognizes the value of employee time and ensures fair and timely compensation for all work beyond standard hours. Our payroll system is designed to automatically calculate overtime, holiday work, and night shifts as per applicable legal requirements and internal pay structures. HR conducts monthly checks to verify the accuracy of extra payments and resolve any discrepancies promptly. Employees are informed of their entitlement through orientation programs, handbooks, and direct communication with HR. Transparent documentation supports fairness and compliance, while prompt grievance redressal mechanisms ensure any payroll concerns related to atypical hours are resolved quickly and equitably.

6.8 Staff Feedback Survey

To ensure ongoing improvement in working conditions, SSMI-AD conducts an annual employee satisfaction survey covering areas such as job satisfaction, manager support, career growth, compensation, and well-being. The survey is confidential, accessible in local languages, and designed to collect honest feedback across all employee levels. Post-survey, the results are analyzed by HR and leadership to identify improvement areas. Action plans are developed collaboratively, and progress is tracked through regular updates. This participatory approach allows employees to feel heard and respected, fosters continuous improvement, and aligns our workplace culture with ESG principles and employee-centered practices.

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6.9 Two-Way Communication on Working Conditions

SSMI-AD believes that open, honest, and continuous communication between employees and management is essential to a healthy workplace. We have established multiple channels for feedback, including employee satisfaction surveys, suggestion boxes, grievance redressal mechanisms, and regular town hall meetings. These forums allow employees to voice concerns, offer ideas, and contribute to policy improvements. All feedback is analyzed and acted upon with transparency, and employees are regularly informed of actions taken. We promote a culture of mutual respect and trust, where employees feel heard, valued, and informed about decisions affecting their work environment and well-being.

6.10 Income Equity Program

SSMI-AD is committed to providing adequate and equitable wages that exceed the national minimum and reflect the cost of living and industry standards. Biannual wage adequacy reviews are conducted, benchmarking pay levels against inflation indices and sector data to maintain economic relevance. Salary structures are designed to reward skill, experience, and performance fairly. Adjustments are made as needed to ensure financial security for our workforce. Transparency and consistency in wage determination strengthen employee trust, enhance retention, and demonstrate SSMI-AD's commitment to decent work, social protection, and responsible business conduct in line with global ESG and labor standards.

6.11 Sufficient Social Protections

At SSMI-AD, we prioritize employee welfare by offering comprehensive social protection regardless of contractual status or location. Our benefits include medical insurance, maternity and paternity leave, retirement and pension provisions, and family care leave, even where not legally required. We proactively extend these protections to all workers, including contract and temporary staff, to foster inclusivity and well-being. Our social protection policies reflect best practices aligned with international labor and human rights standards. Through these initiatives, we promote workforce stability, employee satisfaction, and alignment with ESG goals, contributing to a safer, healthier, and more secure working environment for all.

6.12 Employee Family Benefits

SSMI-AD believes that supporting employees' family responsibilities contributes to their well-being and productivity. We offer inclusive family-friendly programs such as maternity and paternity leave, family care leave, child education referrals, and participation in family engagement events. These benefits are available to all employees, regardless of gender or marital status. Our programs are reviewed regularly for inclusivity, accessibility, and relevance. By fostering a culture of care and understanding, we help employees balance their personal and professional responsibilities. Such support enhances job satisfaction, reduces turnover, and affirms SSMI-AD's commitment to responsible employment and sustainable work-life integration.

6.13 Labor Concerns Mechanism

SSMI-AD has established a fair and confidential grievance mechanism that allows employees to report concerns related to working hours, wages, or benefits. Complaints can be submitted via physical forms, digital portals, or confidential email, in multiple languages.

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Trained grievance officers ensure timely, unbiased resolution while protecting the identity of complainants. The process is designed to prevent retaliation and promote employee trust. All grievances are recorded, monitored, and addressed through a structured investigation and resolution framework. Regular training and awareness sessions ensure employees are informed about their rights and the procedures for seeking redressal of workplace concerns.

6.14 Time Regulation Protocols

SSMI-AD upholds fair labor practices by carefully managing working hours and overtime. We use digital time-tracking systems that accurately record attendance, breaks, and overtime to ensure compliance with labor regulations and company policies. Regular internal audits are conducted to detect and correct excessive or unauthorized working hours. Employees are encouraged to report discrepancies, and all cases of overwork are addressed with corrective measures, including workload reviews or schedule adjustments. Managers are trained to balance productivity with employee well-being, ensuring adequate rest periods and safeguarding against burnout or fatigue due to extended work schedules.


6.15 Workplace Medical Support

SSMI-AD is committed to safeguarding employee health through comprehensive healthcare coverage. Our insurance plans include hospitalization, outpatient treatment, mental health counseling, preventive screenings, and emergency care. Dependents of employees are also eligible under defined terms. Coverage is communicated clearly during onboarding and annual benefits meetings. SSMI-AD partners with reputed insurance providers to ensure wide accessibility and efficient claim settlements. Wellness initiatives, such as health camps and lifestyle management workshops, are also regularly conducted. We view employee health as a cornerstone of business sustainability and continuously work to align our offerings with evolving healthcare standards and employee expectations.

7. ESG Objectives

- | | |
|---|---|
| 1. Sustainability Issue
Objective
Measure
Target Value | : Transparent Salary Communication
: Improve visibility and clarity of pay structures
: % employees with access to salary structure
: ↑ 65% |
| 2. Sustainability Issue
Objective
Measure
Target Value | : Excessive or Unregulated Working Hours
: Limit working hours to compliant thresholds
: % employees within legal working hour limits
: ↑ 90% |
| 3. Sustainability Issue
Objective
Measure
Target Value | : Gender Inequality in Working Conditions
: Eliminate gender-based disparities
: % gender-equity gap in pay and roles
: ↓ 0% |


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- | | |
|---|---|
| <p>4. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Adaptable Work Structures</p> <p>: Promote flexible work arrangements</p> <p>: % departments offering flexible scheduling</p> <p>: ↑ 60%</p> |
| <p>5. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Work-Life Balance & Mental Health Impact</p> <p>: Strengthen employee wellbeing support</p> <p>: % employees covered under mental health support</p> <p>: ↑ 95%</p> |
| <p>6. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Adequate Wages & Inflation Mismatch</p> <p>: Align wages with inflation and living standards</p> <p>: % wage adjustments matching inflation rate</p> <p>: ↑ 65%</p> |
| <p>7. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Workload Compensation Plan</p> <p>: Ensure fair overtime and effort-based pay</p> <p>: % overtime hours compensated fairly</p> <p>: ↑ 60%</p> |
| <p>8. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Staff Feedback Survey</p> <p>: Capture staff perception on working conditions</p> <p>: No. of feedback surveys conducted</p> <p>: ↑ 2</p> |
| <p>9. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Two-Way Communication on Working Conditions</p> <p>: Strengthen employee-management dialogue</p> <p>: % departments with regular dialogue sessions</p> <p>: ↑ 100%</p> |
| <p>10. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Income Equity Program</p> <p>: Promote pay parity across similar job roles</p> <p>: % job roles reviewed for pay parity</p> <p>: ↑ 80%</p> |
| <p>11. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Sufficient Social Protections</p> <p>: Enhance social security and protections</p> <p>: % employees covered by ESI/PF/similar</p> <p>: ↑ 90%</p> |

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12. Sustainability Issue

: Employee Family Benefits

Objective

: Improve employee family welfare

Measure

: % employees accessing family support schemes

Target Value

: ↑ 65%

13. Sustainability Issue

: Labor Concerns Mechanism

Objective

: Establish effective grievance channels

Measure

: % grievances resolved within set timeline

Target Value

: ↑ 55%

14. Sustainability Issue

: Time Regulation Protocols

Objective

: Ensure breaks and rest periods are adhered to

Measure

: % compliance with time regulations

Target Value

: ↑ 100%

15. Sustainability Issue

: Workplace Medical Support

Objective

: Provide access to onsite/offsite health services

Measure

: % workforce with access to medical support

Target Value

: ↑ 100%

8. Applicable Standards, Laws, and Acts

- International: SA8000, UN Global Compact (Principles 3–6),
- ILO Conventions (esp. C1, C131, C155),
- OECD Guidelines, GRI 401.
- National: Indian Labour Code, Minimum Wages Act,
- Factories Act, Employees' State Insurance Act,
- Payment of Gratuity Act.
- Sectoral: Aluminum Stewardship Initiative (ASI) Performance Standard.

9. Distribution and Annual Review

SSMI-AD ensures broad dissemination of this policy to all employees during onboarding through welcome kits, internal emails, intranet postings, and training sessions. Contractors, suppliers, and business partners must review and formally acknowledge the policy as part of their engagement terms, promoting consistent labor standards across operations. Regular communication reinforces compliance and awareness. The ESG Committee, in collaboration with HR, reviews the policy annually, incorporating legal updates, ESG and HR performance data, and stakeholder feedback. Revisions are approved by senior leadership and redistributed accordingly, ensuring the policy remains effective, compliant, and aligned with evolving workforce and market expectations.

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10. Disciplinary Action for Violations

SSMI-AD enforces this policy through a structured disciplinary process. Any employee, contractor, or manager found violating its principles will face appropriate actions depending on the nature and severity of the breach. Disciplinary measures may include verbal or written warnings, suspension, retraining, reassignment, or termination. Each case is reviewed in line with company policies and labor laws to ensure fairness and due process. Repeat or severe violations may lead to dismissal or contract termination. SSMI-AD's firm stance on enforcement ensures a safe, equitable, and respectful working environment for all, in alignment with our ESG commitments.

11. Reporting Mechanism

To ensure accountability and transparency, SSMI-AD has established secure and anonymous reporting mechanisms for employees and stakeholders to raise concerns regarding working conditions. Reports can be submitted through a confidential hotline or an online grievance form accessible via the company intranet. All grievances are investigated by the ESG and HR departments within 10 working days, ensuring timely action. Investigations are conducted fairly and documented thoroughly, with updates provided to the concerned individuals. Protection against retaliation is guaranteed, encouraging openness and trust. This mechanism empowers employees to speak up and supports a culture of continuous improvement and ethical compliance.

12. Conclusion

At SSMI-AD, the well-being and dignity of our workforce are fundamental to our business success and ESG values. This Working Conditions Policy reflects our commitment to fair wages, decent working hours, equitable benefits, and the right to work in a respectful environment. Through proactive communication, periodic reviews, and employee participation, we ensure it evolves to meet changing legal, societal, and organizational needs. By implementing this policy with accountability and compassion, we enhance productivity, morale, and retention while upholding international labor standards. It is a living document that grows with our people and reflects our culture of fairness and inclusion.

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20. Fair Wage Timeline Policy

SSMI-AD/ESG/POLICY-20

1. Purpose

This policy affirms SSMI-AD's commitment to ensure that all employees, contract workers, and value chain workers receive a **living wage** — one that covers basic needs such as food, housing, healthcare, education, and discretionary income. The policy sets out a time-bound plan to phase out poverty wages and promote dignified livelihoods.

2. Scope of Application

This policy applies to all direct employees, contract workers, and third-party personnel engaged across SSMI-AD's value chain. It covers business functions including manufacturing, procurement, logistics, vendor management, warehousing, and outsourcing. The policy is enforced across all domestic sites in India and international supplier operations where SSMI-AD conducts business.

3. Governance

The ESG Committee, reporting to the Board of Directors, is responsible for implementing and monitoring this policy. It collaborates with HR, Procurement, and Finance teams to conduct wage audits, ensure fair compensation practices, and align supplier agreements with living wage standards, reinforcing ethical labor practices across SSMI-AD's operations and supply chain.

4. Definition of Terms

✿ Living Wage

A living wage is the income required for a worker and their family to maintain a decent standard of living. This includes food, housing, education, healthcare, transportation, and some discretionary spending. It also considers unforeseen expenses, ensuring financial security and social well-being beyond basic survival needs.

✿ Minimum Wage

The minimum wage is the lowest hourly, daily, or monthly remuneration that employers may legally pay to workers. Set by government authorities, it aims to prevent exploitative labor but may not always reflect the actual cost of living or ensure a dignified life for the worker and their dependents.

✿ Wage Gap

The wage gap represents the shortfall between the wages currently paid to workers and the living wage benchmark. It highlights income disparities, signaling the need for corrective action to ensure workers earn enough to meet their basic needs and live with dignity, especially in vulnerable or outsourced roles.

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5. Time-Bound Quantitative Target (Living Wage Goal)

SSMI-AD is dedicated to achieving 100% living wage coverage for all direct and contract workers by FY 2027-28. The phased targets are 40% in FY 2024-25, 60% in FY 2025-26, 80% in FY 2026-27, and full coverage by FY 2027-28, using GLWC and Wage Indicator benchmarks for India.

6. Roles and Responsibilities

✿ ESG Committee

The ESG Committee holds oversight responsibility for the Living Wage Policy. It monitors implementation progress, compiles impact reports, ensures inter-departmental coordination, and leads the annual policy review. The committee also advises the Board on strategic changes, risk mitigation, and stakeholder engagement concerning fair wage practices across all operational areas.

✿ HR Department

The Human Resources Department is responsible for auditing payroll systems, conducting wage gap analyses, and recommending updates to wage structures. It ensures internal wage policies align with living wage benchmarks and supports employee communication, grievance resolution, and training programs to foster understanding and support for wage fairness initiatives.

✿ Procurement Team

The Procurement Team ensures that all supplier and vendor contracts include living wage compliance clauses. It evaluates suppliers during onboarding and through regular audits, promoting responsible sourcing. The team works closely with ESG and HR to address wage discrepancies in the supply chain and uphold ethical labor standards.

✿ Finance Department

The Finance Department plans and allocates budgets to support phased wage adjustments in line with living wage benchmarks. It provides financial forecasting and ensures sustainability of wage policies without disrupting operational efficiency. Finance collaborates with HR and Procurement to integrate wage compliance into cost evaluations and supplier assessments.

✿ Site Management

Site Management is responsible for the on-ground execution of the Living Wage Policy. This includes communicating policy changes to workers, collecting feedback, coordinating with HR for wage updates, and addressing grievances. Managers ensure compliance at the operational level and help cultivate a culture of fairness and respect.

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7. Fair Wage Timeline Policy

7.1 Wage Transparency

Transparency in wage structures is fundamental to ensuring fairness and trust in the workplace. SSMI-AD ensures that all workers, including contract and third-party workers, are informed of their wage entitlements, including components such as base pay, bonuses, deductions, and overtime. Payslips are issued in local languages and reviewed with the workers as needed. Suppliers and contractors must adopt similar practices, ensuring employment contracts are clear, signed, and accessible. Wage transparency helps prevent exploitation, enables informed grievance reporting, and strengthens accountability across the labor ecosystem. It is integral to our commitment to fair labor practices.

7.2 Discrimination in Compensation

SSMI-AD is committed to ensuring that compensation practices are equitable and inclusive for all workers, regardless of caste, gender, religion, disability, or any other identity factor. No worker should receive unequal pay for performing the same job or equivalent work. Our HR and procurement systems require the adoption of non-discriminatory wage policies, and we actively engage with suppliers to promote the same. Inclusion in compensation is vital for fostering equality and reinforcing dignity at work. This approach ensures that no segment of the workforce is disadvantaged due to structural or unconscious bias in wage setting.

7.3 Classification of Employment Status

SSMI-AD strictly prohibits the misclassification of employment status, such as labeling full-time workers as independent contractors to avoid wage and benefit obligations. Every worker must be classified according to the nature of their work and must receive all legally mandated compensation, benefits, and protections. We conduct periodic audits to review employment contracts, job roles, and classification practices both internally and among suppliers. Proper classification ensures labor law compliance, supports fair treatment, and protects workers from losing out on essential entitlements such as insurance, bonuses, and retirement contributions.

7.4 Consideration for Family Living Costs

At SSMI-AD, we believe a true living wage must support not just the worker, but their dependents as well. Our wage benchmarks include expenses related to housing, nutrition, healthcare, education, transport, and unforeseen emergencies. We periodically review these benchmarks based on inflation and local socioeconomic conditions. All suppliers are encouraged to move beyond legal minimums and consider family living standards in compensation planning. This approach reflects our broader ESG vision of enabling dignified lives for workers and supporting intergenerational upliftment through sustainable wages and equitable labor policies.

7.5 Worker Voice in Wage Decisions

SSMI-AD believes that inclusive wage governance requires active participation from workers. To this end, we promote platforms such as wage committees, union consultations, and community dialogues to gather feedback and build consensus on wage practices.

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Worker voice is critical to identifying unfair practices, improving satisfaction, and reinforcing trust in wage policies. These forums are open to both direct and contract workers, ensuring representation across the spectrum. By fostering dialogue, we support democratic workplaces where wage decisions reflect real needs, enhance equity, and improve long-term compliance and employee engagement.

7.6 Wage Policy Inaction

SSMI-AD views living wages not as a fixed target but a dynamic goal that evolves with inflation, cost of living, and societal expectations. We commit to reviewing wage benchmarks annually and planning for incremental improvements across internal teams and supplier networks. This forward-looking approach ensures that wage policies stay relevant, competitive, and just. Budgetary provisions are made to support this progression, and all suppliers are encouraged to follow suit. Proactive planning strengthens employee retention, improves productivity, and signals long-term commitment to fairness and well-being across the value chain.

7.7 Wage Resilience Gaps

SSMI-AD recognizes the heightened vulnerability of workers during periods of economic stress such as pandemics, inflation surges, or operational disruptions. Our policy ensures that minimum living wage thresholds are maintained regardless of profitability pressures. We work with finance and procurement teams to safeguard wage budgets and prevent abrupt cuts. Suppliers are also encouraged to establish emergency wage continuity plans. Ensuring wage protection during crises demonstrates our commitment to worker resilience, loyalty, and shared prosperity. It also mitigates long-term social and reputational risks arising from wage suppression during critical periods.

7.8 Wage Abuse by Labor Contractors

Labor contractors, who often serve as intermediaries in our value chain, must be held to the same standards as direct suppliers. SSMI-AD requires thorough vetting of all labor contractors, along with quarterly audits to ensure wage compliance. Workers hired through such contractors must receive fair wages, timely payments, and access to grievance mechanisms. Any contractor found engaging in wage suppression or exploitation will face corrective action, including termination of engagement. By maintaining tight oversight on contractor practices, SSMI-AD ensures that ethical labor standards are upheld uniformly, preventing third-party abuse and safeguarding worker rights.

7.9 Overtime Without Pay

SSMI-AD maintains that all overtime must be voluntary and compensated at legally mandated premium rates. No worker should be forced or coerced into working extra hours without fair remuneration. Our policy requires suppliers and contractors to maintain accurate records of overtime and disclose them during audits. Workers are empowered to decline overtime without fear of retaliation. Ensuring ethical overtime practices supports worker health, reduces burnout, and aligns our operations with labor rights standards. We consider unpaid or forced overtime a serious violation of our human rights and labor compliance commitments.

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7.10 Fair Wage Disparity

SSMI-AD prohibits any form of wage disparity based on identity factors such as gender, caste, religion, or social status. We are committed to fair and equal pay for work of equal value. To ensure equity, we regularly conduct wage audits, review compensation structures, and apply transparent job grading systems. Wage equity is not just a regulatory requirement but a moral imperative that supports inclusive growth, workplace diversity, and employee retention. All partners and contractors must also adopt similar practices to ensure no worker is paid less due to bias, discrimination, or outdated pay structures.

7.11 Regulated Pay Practices

SSMI-AD acknowledges that wage violations often occur deep within the lower tiers of supply chains. To address this, we require our primary suppliers to disclose all subcontractors and ensure that wage practices are monitored and audited at every level. Subcontractors must comply with our wage policy, and any deviation may result in enforcement action against the primary supplier. This layered approach ensures transparency, prevents underpayment, and promotes ethical labor standards throughout our operational footprint. Supply chain traceability and accountability are central to protecting all workers, not just those visible in top-tier contracts.

7.12 Wage Suppression Due to Gender Roles

Gender-based wage suppression is an entrenched problem, particularly in roles traditionally assigned to women. SSMI-AD actively tracks pay data across roles and genders to eliminate such disparities. Job evaluations must be gender-neutral, and any differences must be justifiable based on skill, experience, or performance—not stereotypes. We also monitor job segregation patterns that may funnel women into lower-paying roles. Addressing these inequities is essential to closing the gender pay gap and promoting financial independence. SSMI-AD is committed to creating a fair workplace where gender has no impact on compensation or opportunity.

7.13 Payment of Living Wages

SSMI-AD is committed to ensuring all workers across its operations and extended value chain receive a fair and adequate living wage. This includes not only direct employees but also those employed through contractors and suppliers. All partners are contractually obligated to meet local minimum wage laws and strive to align with living wage benchmarks. SSMI-AD supports this by setting clear expectations, compliance timelines, and conducting periodic monitoring to ensure progress. We believe living wages are critical for improving livelihoods, promoting worker dignity, and ensuring ethical sourcing and manufacturing practices throughout our business ecosystem.

7.14 Fair Wage Evaluation

At SSMI-AD, we are committed to fair compensation aligned with ESG principles. We conducted a comprehensive analysis of our employees' wage levels against a living wage benchmark using a methodology recognized by the IDH Living Wage Benchmark Methodologies Recognition Process. This assessment covered all employee categories and considered essential cost-of-living factors including food, housing, healthcare, education, and discretionary income.

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Our analysis revealed that current wage levels meet or exceed the identified benchmark, affirming our dedication to decent work and social equity. We will continue periodic reviews to ensure alignment with evolving benchmarks and maintain fair remuneration standards.

7.15 Regular Wage Payments

SSMI-AD upholds the principle that workers must be paid their wages fully and on time. Any delay in wage payment undermines the worker's right to dignity and financial stability. We mandate that all internal departments, suppliers, and contractors adhere strictly to wage disbursement deadlines as prescribed by law. In cases where delays are identified, immediate investigations and corrective actions are initiated. Timely payment is not only a legal obligation but also an essential aspect of worker trust, retention, and well-being. We actively monitor wage disbursement and treat delays as compliance violations subject to escalation.


7.16 Paid Social Contributions

SSMI-AD mandates that all wage structures include contributions to statutory benefits such as provident fund, employee state insurance, bonuses, and gratuity wherever applicable. These components are critical to long-term financial security and worker welfare. Regular payroll audits are conducted to ensure internal and supplier compliance. Non-payment or evasion of these responsibilities is considered a serious breach of our labor policy. Ensuring benefits are disbursed timely reinforces SSMI-AD's commitment to responsible employment and holistic worker support beyond just monthly wages, enabling long-term economic resilience for workers and their families.

8. ESG Objectives


- Sustainability Issue** : **Wage Transparency**
Objective : Disclose wage structures clearly to all employees
Measure : % of roles with published wage brackets
Target Value : ↑ 60%
- Sustainability Issue** : **Discrimination in Compensation**
Objective : Ensure equal pay for equal work across all demographics
Measure : % of wage parity across comparable positions
Target Value : ↑ 65%
- Sustainability Issue** : **Classification of Employment Status**
Objective : Accurately classify all workers under applicable labor laws
Measure : % of correctly classified employees
Target Value : ↑ 75%

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- | | |
|---|---|
| <p>4. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Consideration for Family Living Costs</p> <p>: Integrate family needs into wage policy</p> <p>: % of wage reviews factoring household living costs</p> <p>: ↑ 70%</p> |
| <p>5. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Worker Voice in Wage Decisions</p> <p>: Involve workers in wage-setting processes</p> <p>: % of wage reviews with worker consultation</p> <p>: ↑ 90%</p> |
| <p>6. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Wage Policy Inaction</p> <p>: Review and update wage policy regularly</p> <p>: # of annual wage policy reviews</p> <p>: ↑ 2</p> |
| <p>7. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Wage Resilience Gaps</p> <p>: Strengthen wage protection against inflation and shocks</p> <p>: % of wage increments aligned to inflation</p> <p>: ↑ 80%</p> |
| <p>8. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Wage Abuse by Labor Contractors</p> <p>: Ensure fair pay for contracted labor</p> <p>: % of contract workers receiving verified payments</p> <p>: ↑ 75%</p> |
| <p>9. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Overtime Without Pay</p> <p>: Prevent unpaid or forced overtime</p> <p>: % of overtime hours compensated</p> <p>: ↑ 100%</p> |
| <p>10. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Fair Wage Disparity</p> <p>: Minimize unjustified wage gaps</p> <p>: % reduction in wage disparity ratio</p> <p>: ↓ 15%</p> |
| <p>11. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Regulated Pay Practices</p> <p>: Standardize compensation practices across the company</p> <p>: % of departments following wage policy guidelines</p> <p>: ↑ 90%</p> |

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12.Sustainability Issue

: Gender Wage Disparity

Objective

: Close gender pay gaps

Measure

: % of roles with equal pay by gender

Target Value

: ↑ 95%

13.Sustainability Issue

: Payment of Living Wages

Objective

: Guarantee minimum living wage to all workers

Measure

: % of employees earning above living wage threshold

Target Value

: ↑ 100%

14.Sustainability Issue

: Fair Wage Evaluation

Objective

: Benchmark wages against local living wage standards

Measure

: % jobs evaluated against living wage benchmarks

Target Value

: ↑ 100%

15.Sustainability Issue

: Regular Wage Payments

Objective

: Ensure timely and consistent salary disbursal

Measure

: % of payments made on scheduled dates

Target Value

: ↑ 100%

16.Sustainability Issue

: Paid Social Contributions

Objective

: Comply with statutory social benefit payments

Measure

: % of social contributions paid on time

Target Value

: ↑ 60%

9. Applicable Standards, Laws, and Acts

- SA8000: Living Wage requirement
- UN Global Compact (Principles 1, 3, 6)
- Aluminum Stewardship Initiative – Labor Standards
- OECD Guidelines for Multinational Enterprises
- ILO Conventions 26,
- 95, and 131 (Minimum Wage Fixing)
- Global Reporting Initiative (GRI) – Disclosure 202-1, 202-2
- Minimum Wages Act, 1948
- Code on Wages, 2019
- Equal Remuneration Act, 1976
- Contract Labour (Regulation and Abolition) Act, 1970

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10. Distribution and Annual Review

SSMI-AD ensures its Living Wage Policy is effectively communicated through multiple channels. Internally, it is shared via HR portals, internal emails, and displayed on notice boards at all sites. Externally, the policy is embedded in procurement contracts and introduced to contractors and suppliers during onboarding and reviews. To promote transparency, it is also published on the company's website. The policy is reviewed annually by the ESG Committee, HR, and Procurement teams, considering economic trends, legal changes, stakeholder feedback, and implementation challenges. This process ensures continuous improvement, reinforces fair wage practices, and strengthens ESG accountability across SSMI-AD's operations and supply chain.

11. Disciplinary Action for Violators

To ensure adherence to the Living Wage Policy, SSMI-AD enforces clear disciplinary measures. Internal non-compliance—such as failure to implement wage practices or deliberate underpayment—may result in formal warnings, HR-led investigations, mandatory corrective training, or termination, depending on the severity of the violation. Suppliers or contractors found in violation of the policy will be subject to progressive enforcement, including written warnings, defined remediation periods, and potential contract suspension or termination. These actions reinforce SSMI-AD's zero-tolerance approach toward wage abuse and unethical practices, ensuring all stakeholders are accountable and uphold the principles of fair and respectful labor practices.

12. Reporting Mechanism

SSMI-AD has established multiple, safe, and confidential channels to report concerns related to wage underpayment or policy violations. Employees and contractors can access anonymous grievance portals, call dedicated helplines, or approach the HR department in person. These mechanisms ensure complaints can be made without fear of retaliation. Monthly wage audits are conducted to proactively detect discrepancies, and external grievance systems are available for third-party stakeholders. All reports are promptly investigated and addressed through transparent procedures. These mechanisms promote trust, early intervention, and accountability, ensuring every worker's right to a living wage is respected and upheld.

13. Conclusion

At SSMI-AD, the Living Wage Policy is a cornerstone of our ESG strategy, emphasizing the importance of dignity, fairness, and economic inclusion. We recognize that paying a living wage is not only a matter of legal compliance but also a reflection of our commitment to human rights and responsible business. Through this policy, we aim to uplift workers, strengthen supply chains, and support long-term community development. By ensuring fair wages across all operations and partnerships, we contribute meaningfully to reducing inequality, enhancing employee well-being, and advancing a sustainable and equitable future for all.

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21. Business Ethics Compliance Policy

SSMI-AD/ESG/POLICY-21

1. Purpose

To ensure a transparent, ethical, and legally compliant business environment, SSMI-AD is committed to preventing corruption and bribery in all its forms. This policy sets forth our framework for detecting, preventing, and remediating corruption-related risks throughout the company's operations and supply chains.

2. Scope of Application

This policy applies to all SSMI-AD employees, contractors, suppliers, vendors, agents, and business partners across all business activities including procurement, sales, marketing, and logistics. It covers our entire operations within India and extends to all international transactions, collaborations, and partnerships where SSMI-AD is directly or indirectly involved.

3. Governance

The governance of this policy lies with the ESG Compliance Committee, chaired by the Chief Compliance Officer (CCO), and is operationally supported by the Internal Audit, Legal, and HR departments. Oversight responsibilities rest with the Board-level ESG and Ethics Committee, ensuring strategic alignment, regulatory compliance, and ethical accountability across all levels of SSMI-AD's operations.

4. Definitions

✿ Corruption

Corruption involves the misuse of entrusted authority for personal or organizational gain. It includes unethical or illegal acts that distort decision-making, erode trust, and harm public or private interests. At SSMI-AD, all forms of corruption are strictly prohibited and subject to disciplinary and legal consequences.

✿ Bribery

Bribery is the act of offering, giving, receiving, or requesting anything of value—such as money, gifts, or favors—with the intent to influence the actions or decisions of individuals in positions of authority. It undermines ethical conduct, disrupts fair competition, and is forbidden in all SSMI-AD operations.

✿ Facilitation Payments

Facilitation payments are unofficial, minor payments made to speed up routine actions by public officials, such as permit approvals or customs clearance. Despite being common in some regions, SSMI-AD strictly prohibits such payments as they contribute to systemic corruption and violate both legal standards and ESG principles.

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Kickbacks

Kickbacks involve the return of a portion of payment received, often through secret arrangements or coercion, in exchange for securing contracts or favorable treatment. These practices create unfair advantages, breach trust, and are completely banned at SSMI-AD to maintain transparency and integrity in all transactions.

5. Roles and Responsibilities

Employees

All employees must act with integrity and avoid engaging in any corrupt practices, including bribery, kickbacks, or facilitation payments. They are obligated to report suspected or actual violations promptly and cooperate in investigations, thereby supporting a transparent, ethical, and legally compliant working environment across all SSMI-AD operations.

Managers

Managers are responsible for fostering an anti-corruption culture within their teams. They must lead by example, ensure employees understand and follow anti-corruption policies, and provide relevant training. Managers must promptly escalate any concerns or breaches and ensure that preventive and corrective measures are implemented effectively and without bias.

Compliance Officer

The Compliance Officer is responsible for overseeing the implementation of anti-corruption policies. This includes maintaining detailed records, conducting periodic risk assessments, investigating reported breaches, and ensuring corrective action. The officer also coordinates with internal audit and legal teams to uphold ethical practices across SSMI-AD's operations and partnerships.

Vendors/Contractors

Vendors, contractors, and third-party agents must adhere to SSMI-AD's anti-corruption standards as part of their contractual obligations. They are required to operate transparently, avoid unethical practices, and report any misconduct. Non-compliance may result in contract termination, legal action, or blacklisting from future business with SSMI-AD.

6. Business Ethics Compliance Policy

6.1 Gifts and Hospitality Abuse

While token gifts and hospitality may be exchanged in certain cultures or business contexts, SSMI-AD requires that such practices remain modest, transparent, and incapable of influencing business decisions. Any gift or hospitality—whether given or received—must be reported, recorded, and pre-approved if exceeding defined thresholds.

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Extravagant or frequent gestures raise concerns of undue influence and are not permitted. SSMI-AD discourages offering anything that may be seen as a bribe, and accepts gifts only in line with company policy and legal standards. The goal is to avoid real or perceived conflicts of interest while respecting cultural norms.

6.2 Bribery Controls Audit

SSMI-AD strengthens its anti-corruption framework through regular audits that evaluate the adequacy and effectiveness of internal controls. These audits are conducted by internal audit teams and, where necessary, by independent external experts. Audit plans cover procurement, finance, HR, and third-party engagements and include random checks and forensic reviews. Findings are documented and reported to the ESG and Ethics Committee, with clear follow-up actions and timelines. Audit outcomes feed into broader risk management and compliance strategies, enabling continuous improvement and ensuring accountability at all levels of the organization.

6.3 Political Contributions

SSMI-AD prohibits political contributions unless explicitly approved by the ESG Committee and made in strict compliance with applicable national and international laws. Contributions must be transparent, properly documented, and aligned with the company's business values and non-partisan stance. Unauthorized or hidden contributions to political parties, candidates, or officials are forbidden as they may be construed as attempts to gain influence. Employees are encouraged to participate in civic activities personally, but such actions must not be made in the name of the company. Transparency, accountability, and legal compliance are central to our political engagement policy.

6.4 Compliance Risk Survey

SSMI-AD conducts scheduled and ad-hoc corruption risk assessments to identify vulnerabilities across its departments and business operations. The assessment framework maps out high-risk roles, jurisdictions, business partners, and transactions, providing a structured view of potential exposure. Risk reviews include input from relevant departments and consider both internal and external factors. Where gaps are identified, mitigation plans and control enhancements are developed and tracked. These assessments are not only preventive but also responsive to changes in business strategy or regulatory landscapes, ensuring SSMI-AD remains agile and compliant in its anti-corruption efforts.

6.5 Transparent Sponsorships or Donations

SSMI-AD supports sponsorships and donations aligned with our ESG values and social responsibility goals. However, all such financial or in-kind contributions must be legitimate, approved, and well-documented. We prohibit the use of charitable contributions as a disguise for bribery, favoritism, or gaining undue influence. Sponsorships and donations must not be made to entities or individuals connected to government officials without a rigorous compliance review. Transparency and accountability are key: records must be maintained, and beneficiaries must be verified. SSMI-AD upholds the highest standards of integrity in its philanthropic and promotional engagements.

6.6 Third-Party Integrity

SSMI-AD requires all third-party engagements—including suppliers, agents, contractors, and intermediaries—to undergo a rigorous anti-corruption due diligence process. This protocol includes background checks, conflict of interest declarations, reputational screening, and assessment of financial integrity and ethical practices.

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Due diligence is tailored based on the risk profile and geography of the third party. No contract is executed without full clearance from the compliance team. Red flags are escalated to the ESG Compliance Committee for review, and engagement may be suspended pending resolution. This proactive process is integral to safeguarding SSMI-AD's operations against third-party corruption risks.

6.7 Procurement Fraud

SSMI-AD enforces robust procurement practices to prevent fraud, favoritism, and manipulation of tendering processes. All purchases must follow transparent, competitive, and merit-based procedures, with clear documentation and approval trails. Acts such as bid rigging, price fixing, supplier collusion, or favoritism are considered serious violations of this policy. Employees involved in procurement must act with impartiality and due diligence to select suppliers based solely on merit and value. Vendors are also expected to adhere to fair bidding practices. Any suspected irregularities must be reported and investigated thoroughly to preserve the fairness and integrity of our supply chain.

6.8 Transaction Risk Oversight

SSMI-AD implements a formal approval system for transactions that pose a risk of perceived or actual impropriety, such as gifts, entertainment, travel, donations, or high-value vendor payments. Employees are required to seek prior written approval from designated authorities based on the monetary value and risk classification of the transaction. Documentation and justification must accompany every request, and approvals are logged for audit purposes. The policy is communicated clearly through employee handbooks and training. By ensuring transparency and traceability, SSMI-AD upholds its commitment to ethical business practices and guards against undue influence or favoritism.

6.9 Kickbacks and Commissions

SSMI-AD strictly prohibits any arrangement involving kickbacks, improper commissions, or covert financial incentives. Kickbacks—typically secret payments exchanged for preferential treatment—compromise integrity and business ethics. All transactions and agreements must be transparent and justifiable, with no expectation of personal benefit for employees or partners. This applies across all departments, especially procurement, sales, and contracting. Any employee or third party found engaging in or soliciting kickbacks will be subject to disciplinary measures, contract termination, and legal action. SSMI-AD promotes fair business dealings that are free from coercion, manipulation, or reward-based favoritism.

6.10 Bribery Prevention Education

SSMI-AD is dedicated to fostering an ethical workplace by mandating regular anti-corruption and anti-bribery training for all employees. This includes onboarding sessions for new hires and advanced modules for employees in high-risk roles. The training curriculum incorporates practical scenarios, local and international legal standards (e.g., FCPA, Prevention of Corruption Act), and interactive case studies to enhance learning. Refresher training is provided annually, and participation is closely monitored to ensure full coverage. The program reinforces ethical decision-making, encourages the identification and reporting of misconduct, and strengthens employees' confidence in upholding SSMI-AD's zero-tolerance stance on corruption and bribery.

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6.11 Adequate Anti-Corruption Controls

SSMI-AD is committed to proactively identifying and eliminating corruption risks through strong internal control systems. These controls include risk assessments, training, auditing, reporting channels, and review mechanisms embedded within our ESG governance framework. Any gaps in these systems are treated seriously and prompt immediate corrective actions. We continually update our policies, procedures, and monitoring tools based on emerging threats, regulatory developments, and stakeholder feedback. SSMI-AD ensures that its compliance structure evolves with changing business environments, thereby sustaining an ethical culture of transparency and zero tolerance for corrupt practices across the organization.

6.12 Third-Party Corruption Risks

SSMI-AD recognizes that third parties—such as agents, consultants, vendors, and distributors—pose a significant corruption risk. Therefore, we require all third parties engaged with SSMI-AD to comply with our anti-corruption standards. Due diligence processes are conducted before onboarding, and periodic reviews and audits ensure continuing compliance. Contracts include explicit anti-bribery and anti-corruption clauses, and non-compliance can lead to termination and legal consequences. We expect partners to uphold the same ethical standards as SSMI-AD, including transparent record-keeping, adherence to laws, and commitment to fair business practices. Our integrity extends beyond our operations to our entire value chain.

6.13 Stakeholder Alert Mechanism

SSMI-AD has implemented a robust whistleblower procedure that empowers internal and external stakeholders to report suspected incidents of corruption or bribery without fear of retaliation. Reporting channels include a secure email ID, anonymous web portal, and a 24/7 hotline. Whistleblower reports are handled confidentially and are directed to a designated grievance cell for investigation and resolution. SSMI-AD guarantees protection for all whistleblowers, and disciplinary action is taken against anyone found retaliating. Awareness campaigns and internal communications promote the use of the mechanism, reinforcing SSMI-AD's commitment to transparency, accountability, and trust in its operations.

6.14 Bribery of Government Officials

SSMI-AD maintains a strict zero-tolerance stance against bribery involving public officials. Any form of offering, promising, or giving anything of value to government representatives to secure business advantages or regulatory leniency is strictly forbidden. We uphold national laws and global frameworks like the Foreign Corrupt Practices Act (FCPA) and the Prevention of Corruption Act, India. All employees, contractors, and third parties must refrain from engaging in or facilitating such conduct. Breaches will trigger disciplinary action and may be reported to the appropriate legal authorities. SSMI-AD strives to maintain transparent and ethical relationships with all government bodies.

6.15 Facilitation Payments

Facilitation payments, regardless of their size or purpose, are not permitted under SSMI-AD's anti-corruption policy. These small, unofficial payments made to expedite routine administrative actions undermine the principles of fairness and accountability.

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Even in geographies where such practices are culturally normalized, SSMI-AD expects strict compliance with our global ethical standards. Employees and third-party associates must not offer or authorize any such payments, and must report any request for facilitation immediately through the established reporting mechanisms. Our operations are governed by integrity, and all forms of coercion, bribery, or influence-peddling are incompatible with SSMI-AD's core values.


6.16 Conflict of Interest

SSMI-AD mandates full transparency in business dealings by requiring the disclosure of any actual, potential, or perceived conflicts of interest. A conflict arises when personal interests interfere or appear to interfere with the company's interests. Employees and management are required to act solely in the best interests of SSMI-AD without bias or personal gain. Failure to disclose such conflicts is a breach of this policy. Annual declarations, oversight reviews, and clear documentation ensure that ethical decision-making is preserved across all levels of the organization. Upholding objectivity is essential to building stakeholder trust and maintaining corporate integrity.

7. ESG Objectives

- Sustainability Issue** : **Gifts and Hospitality Abuse**
Objective : Monitor and regulate gift and hospitality practices
Measure : % declared gifts/hospitality recorded
Target Value : ↑ 55%
- Sustainability Issue** : **Bribery Controls Audit**
Objective : Conduct regular audits on bribery controls
Measure : No. of anti-bribery audits conducted
Target Value : ↑ 1/year
- Sustainability Issue** : **Political Contributions**
Objective : Ensure transparency in political contributions
Measure : % publicly disclosed contributions
Target Value : ↑ 100%
- Sustainability Issue** : **Compliance Risk Survey**
Objective : Identify areas vulnerable to corruption
Measure : % employees completing compliance surveys
Target Value : ↑ 95%
- Sustainability Issue** : **Transparent Sponsorships or Donations**
Objective : Improve transparency in sponsorship and donation
Measure : % donations recorded and disclosed
Target Value : ↑ 90%

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6. Sustainability Issue

: Third-Party Integrity

Objective

: Vet third-party partners for corruption risks

Measure

: % third parties screened

Target Value

: ↑ 85%

7. Sustainability Issue

: Procurement Fraud

Objective

: Reduce fraud risks in procurement

Measure

: % high-risk procurement reviews completed

Target Value

: ↑ 90%

8. Sustainability Issue

: Transaction Risk Oversight

Objective

: Monitor financial transactions for irregularities

Measure

: % transactions reviewed

Target Value

: ↑ 90%

9. Sustainability Issue

: Kickbacks and Commissions

Objective

: Detect and prevent unauthorized commissions

Measure

: % contracts with anti-kickback clauses

Target Value

: ↑ 95%

10. Sustainability Issue

: Bribery Prevention Education

Objective

: Train employees on bribery risks

Measure

: % employees trained

Target Value

: ↑ 100%

11. Sustainability Issue

: Adequate Anti-Corruption Controls

Objective

: Strengthen internal anti-corruption mechanisms

Measure

: % improvement actions implemented

Target Value

: ↑ 100%

12. Sustainability Issue

: Third-Party Corruption Risks

Objective

: Monitor third-party corruption indicators

Measure

: % third-party contracts reviewed

Target Value

: ↑ 100%

13. Sustainability Issue

: Stakeholder Alert Mechanism

Objective

: Facilitate corruption reporting


Measure

: % stakeholders aware of whistleblower channel

Target Value

: ↑ 100%

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14.Sustainability Issue : Bribery of Government Officials

Objective : Prevent and penalize bribery attempts
Measure : % reported bribery cases investigated
Target Value : ↑ 65%

15.Sustainability Issue : Facilitation Payments

Objective : Eliminate facilitation payments
Measure : No. of facilitation payments reported
Target Value : ↓ 0

16.Sustainability Issue : Conflict of Interest

Objective : Detect and address conflicts of interest
Measure : % conflict declarations submitted
Target Value : ↑ 65%

8. Applicable Standards, Laws, and Acts

- US Foreign Corrupt Practices Act (FCPA)
- UK Bribery Act
- UN Global Compact (Principle 10)
- OECD Guidelines for Multinational Enterprises
- ISO 37001 (Anti-Bribery Management Systems)
- GRI Standards (GRI 205: Anti-corruption)
- Prevention of Corruption Act, 1988 (as amended)
- Companies Act, 2013
- Indian Penal Code, 1860

9. Distribution and Annual Review

SSMI-AD disseminates its Anti-Corruption Policy to all internal stakeholders—employees and contractors—through onboarding materials, regular training sessions, internal communication portals, and team meetings. For external stakeholders such as vendors and business partners, relevant clauses are embedded in contracts, and anti-corruption handbooks are distributed. Translations into local languages are provided when necessary to ensure full comprehension. This multi-channel communication fosters consistent awareness and implementation across all operations. The policy is reviewed annually by the ESG Compliance Committee in consultation with legal, HR, and audit teams. Updates reflect legal changes, global standards, audits, and stakeholder input, reinforcing SSMI-AD's commitment to ethical conduct and ESG integrity.

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10. Disciplinary Action for Violators

Violations of SSMI-AD's anti-corruption policy are treated with utmost seriousness. Depending on the severity of the breach, consequences may include verbal or written warnings, retraining, suspension, demotion, or termination of employment or contract. Vendors and external parties found in breach may face blacklisting, contract termination, and legal action. All disciplinary measures are applied in a fair, proportional, and transparent manner. In cases involving legal infractions, appropriate actions will be taken under applicable Indian or international laws. These measures underscore SSMI-AD's commitment to ethical practices, corporate accountability, and its zero-tolerance stance on corruption and bribery.

11. Reporting Mechanism

SSMI-AD provides secure and accessible channels for reporting corruption, including an anonymous whistleblower hotline and dedicated grievance redressal cells for employees and external partners. Reports are handled with the highest level of confidentiality, ensuring the identity of whistleblowers remains protected. Retaliation against individuals who report concerns in good faith is strictly prohibited and will result in disciplinary action. All reports are acknowledged, investigated promptly, and outcomes are documented. This robust mechanism reinforces transparency, encourages early detection, and supports a culture of integrity across SSMI-AD's operations and partner networks.

12. Conclusion

SSMI-AD upholds a zero-tolerance policy toward corruption, bribery, and unethical behavior. We are committed to fostering a culture of integrity, transparency, and accountability in line with our ESG values. Through clear policies, active governance, stakeholder engagement, and continuous monitoring, we aim to build and maintain trust with our employees, partners, and the wider community. This anti-corruption policy reflects our dedication to lawful and ethical business practices, both in India and globally. We believe that sustainable success can only be achieved when our operations are rooted in fairness, compliance, and responsible corporate conduct.

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22. Green Procurement Policy

SSMI-AD/ESG/POLICY-22

1. Purpose

To ensure that SSMI-AD integrates environmental sustainability into its procurement practices by prioritizing responsible sourcing of raw materials and secondary metals, minimizing environmental impacts, and promoting transparency and traceability in the supply chain. This policy supports sustainable development goals, reduces greenhouse gas emissions, and aligns procurement activities with global and local environmental standards and stakeholder expectations.

Scope of Application

This policy applies to all employees involved in procurement, supply chain management, and supplier evaluation, including third-party contractors and vendors. It covers procurement and sourcing activities related to raw materials, scrap metal, and associated supplies used in non-ferrous alloy ingot manufacturing across India and international supplier operations.

Governance

The Sustainability & Procurement Committee oversees the policy's implementation, monitoring, and review. The Procurement Manager is accountable for enforcing sustainable procurement practices and ensuring supplier compliance. Regular updates are reported to the Executive Leadership Team and integrated into SSMI-AD's ESG disclosures to maintain transparency and drive continuous sustainability improvements.

4. Definition of Terms

✿ Non-Ferrous Metals (NF Metals)

Non-ferrous metals are those that do not contain significant amounts of iron, making them resistant to rust and corrosion. Common examples include aluminum, copper, zinc, and nickel. These metals are essential in industries requiring lightweight, durable materials, particularly in manufacturing, electrical components, and construction.

✿ Secondary Raw Materials

Secondary raw materials are recycled metals or scrap materials that are reprocessed and reused in manufacturing. Utilizing these materials helps reduce environmental impact, conserve natural resources, and lower production costs. They play a crucial role in circular economy models and sustainable production, particularly in the non-ferrous metal industry.

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✿ Traceability

Traceability refers to the ability to track the origin, journey, and processing stages of raw materials throughout the supply chain. This ensures transparency, facilitates compliance with regulations, and supports responsible sourcing. Traceability systems help identify the source of issues, verify ethical practices, and enhance overall supply chain integrity.

✿ CSR Assessment

A CSR (Corporate Social Responsibility) assessment evaluates a supplier's performance in areas like labor rights, environmental management, ethical conduct, and community engagement. These assessments ensure that suppliers align with a company's sustainability standards and ethical values, and are often used as a tool for supplier selection and monitoring.

✿ REACH

REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals) is a European Union regulation designed to protect human health and the environment from risks posed by chemicals. It requires manufacturers and importers to assess and manage chemical risks and provide safety information for substances used in industrial and consumer applications.

✿ Sustainable Procurement

Sustainable procurement involves purchasing goods and services in a way that considers environmental, social, and economic impacts. It promotes responsible sourcing, reduces environmental footprint, and supports ethical labor practices. Organizations use sustainable procurement to align supply chain decisions with corporate sustainability goals and stakeholder expectations.

5. Roles and Responsibilities

✿ Procurement Team

The Procurement Team is responsible for implementing sustainable sourcing criteria, conducting regular supplier audits, and ensuring compliance with environmental and social standards. They play a key role in supplier selection and evaluation, integrating sustainability into procurement decisions, and driving accountability throughout the supply chain.

✿ Suppliers

Suppliers must adhere to defined environmental and social standards, ensuring ethical and sustainable practices in their operations. They are required to maintain transparency by providing accurate documentation and disclosures related to sourcing, labor practices, and environmental impact, supporting SSMI-AD's commitment to responsible supply chain management.

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✳ Sustainability Team

The Sustainability Team develops and updates procurement-related sustainability policies, monitors key performance indicators (KPIs), and provides training to internal stakeholders. Their role ensures that procurement practices align with ESG goals and evolving regulatory requirements, fostering continuous improvement and awareness across the organization.

✳ All Employees

All employees are expected to remain vigilant and report any concerns or potential risks related to procurement sustainability. This includes issues like unethical sourcing, environmental violations, or human rights abuses. Their involvement supports early detection, promotes ethical conduct, and strengthens the overall integrity of the procurement process.

6. Green Procurement Policy

6.1 Responsible Natural Resources

To ensure long-term resource sustainability, SSMI-AD mandates suppliers to adopt responsible practices in sourcing, extraction, and usage of natural resources. Suppliers shall avoid over-exploitation of raw materials, reduce water and energy consumption, and implement conservation measures across their operations. Where possible, suppliers are encouraged to adopt renewable energy, water recycling, and energy-efficient technologies. Transparency in reporting resource use and improvement in efficiency will be a key evaluation factor during supplier selection. Through collaboration with suppliers, SSMI-AD will promote innovative solutions that protect ecosystems, prevent resource depletion, and contribute to global goals for sustainable resource management.

6.2 Social Impact Training

SSMI-AD trains its procurement staff on environmental sustainability and ethical sourcing to ensure informed and responsible decision-making. Training programs cover regulatory requirements, ESG trends, environmental risk identification, and best practices for sustainable procurement. By equipping buyers with the knowledge to assess and influence supplier behavior, the company empowers them to act as sustainability champions. Ongoing refresher sessions and capacity-building workshops ensure that procurement teams remain current on environmental developments. The initiative embeds ESG thinking into the daily operations of procurement, fostering greater alignment between corporate values and supplier engagement practices.

6.3 Environmental Laws and Standards

All suppliers must comply with ISO 14001 requirements, Indian environmental regulations, and international sustainability standards. Non-compliance, including illegal waste disposal, excessive emissions, or use of restricted substances, will be grounds for immediate corrective action or termination of business relationships. SSMI-AD expects suppliers to provide certifications, audit reports, and legal compliance documents as evidence of their environmental responsibility.

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Continuous improvement in environmental performance will be encouraged through supplier development programs. Suppliers demonstrating leadership in sustainability practices will be prioritized, ensuring that SSMI-AD's supply chain is fully aligned with responsible, transparent, and legally compliant environmental standards.

6.4 Sustainable Sourcing Practices

SSMI-AD is committed to protecting biodiversity and preventing negative impacts from unsustainable sourcing. Suppliers shall not engage in practices that lead to deforestation, habitat destruction, or depletion of scarce ecological resources. All suppliers must ensure raw materials are sourced responsibly, with preference given to certified sustainable sources (e.g., FSC, PEFC). Suppliers should disclose sourcing origins and avoid products linked to biodiversity loss or environmental harm. SSMI-AD will prioritize business relationships with suppliers who commit to biodiversity preservation, adopt regenerative practices, and support initiatives that restore natural ecosystems while maintaining ethical and sustainable supply chains.

6.5 Supplier Risk Evaluation

SSMI-AD systematically assesses its supply chain to identify and prioritize sustainability risks including environmental damage, forced labor, corruption, and non-compliance with local laws. These assessments help the company allocate resources efficiently, focus on high-risk suppliers, and take targeted action to mitigate adverse impacts. Risk assessments are performed through desktop evaluations, site visits, and stakeholder engagement. The process supports a proactive approach to ESG risk management, enabling early detection and resolution. Findings also inform procurement strategies, partner selection, and sustainability reporting, contributing to a more resilient and ethical supply chain ecosystem.

6.6 Eco-Social Supplier Audit

SSMI-AD actively supports its suppliers in improving their environmental and social practices through structured capacity-building initiatives. These may include technical training, workshops, management system support, process upgrades, or sharing of industry best practices. The aim is to reduce suppliers' exposure to sustainability risks such as pollution, resource depletion, and labor exploitation. Capacity-building programs foster mutual growth, strengthen supplier relationships, and align external operations with SSMI-AD's ESG objectives. The company views supplier development not just as risk mitigation but as a strategic investment in long-term value creation and supply chain resilience.

6.7 Environmental Responsibility Activities

SSMI-AD requires all suppliers and subcontractors to conduct their operations with strict adherence to environmental sustainability. Activities such as waste disposal, emissions management, and resource extraction must comply with applicable national laws, ISO 14001 requirements, and international best practices. Suppliers shall minimize pollution, adopt cleaner technologies, and ensure environmentally sound practices throughout their operations. Regular monitoring, audits, and supplier self-assessments will be conducted to evaluate compliance. Partnerships with suppliers will focus on fostering improvements in environmental performance, ensuring that SSMI-AD's supply chain does not contribute to degradation of ecosystems or unsustainable industrial practices.

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6.8 Hazardous Waste Management

Suppliers must establish strict controls for managing emissions, effluents, and hazardous waste to avoid pollution risks. Chemicals and waste must be stored, handled, and disposed of in compliance with applicable national regulations and international standards. Suppliers must provide proof of waste treatment and disposal practices, supported by relevant certificates. Emergency response plans for chemical spills, accidents, or leaks must be in place. Suppliers shall avoid use of banned substances, and where possible, replace hazardous materials with safer alternatives. SSMI-AD will work with suppliers to continuously reduce pollution risks and promote safe, sustainable production processes.

6.9 Responsible Sourcing Assessment

To ensure that suppliers align with SSMI-AD's sustainability objectives, each supplier is periodically evaluated based on their environmental performance. Assessments are conducted via standardized questionnaires, audits, or third-party verification. The process evaluates factors such as energy usage, pollution controls, waste management, and climate-related disclosures. Identified gaps trigger corrective action plans and follow-ups. This assessment serves not only as a risk mitigation tool but also fosters continuous improvement by tracking supplier progress over time. Results contribute to supplier scorecards, procurement decisions, and ESG reporting, reinforcing transparency and accountability throughout the supply network.

6.10 Minimizing Environmental Impact

SSMI-AD requires suppliers to ensure that purchased goods and materials have minimal environmental impact. Materials that are energy-intensive, non-recyclable, or toxic shall be reduced, substituted, or eliminated where feasible. Suppliers must prioritize sustainable alternatives, including recyclable, biodegradable, and low-carbon materials. Transparency regarding material composition, origin, and life-cycle environmental impact is mandatory. Suppliers must provide Material Safety Data Sheets (MSDS) and test certificates for compliance verification. Preference will be given to suppliers demonstrating innovation in eco-design, material substitution, and life-cycle thinking to help SSMI-AD achieve its commitment to sustainable product stewardship and circular economy principles.

6.11 Supplier Recognition Scheme

To encourage environmental excellence, SSMI-AD implements supplier incentive programs that reward outstanding sustainability performance. High-performing suppliers may receive benefits such as recognition awards, extended contract terms, preferred vendor status, and priority access to business opportunities. These programs are designed to motivate continuous improvement and create a culture of positive competition among suppliers. Performance evaluations are based on objective sustainability metrics and compliance with environmental clauses. Incentives not only build supplier loyalty but also reinforce the importance of environmental responsibility, making ESG criteria a key factor in long-term business partnerships.

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6.12 Ethical Sourcing Clauses

SSMI-AD integrates environmental sustainability clauses into all supplier contracts to uphold environmental and social accountability across the value chain. These clauses set clear expectations for responsible practices, such as waste reduction, emissions control, and responsible sourcing. Contracts will stipulate corrective actions for breaches, including escalation procedures and potential termination. By formalizing sustainability obligations in contractual terms, SSMI-AD strengthens its supply chain due diligence framework and ensures legal backing for ESG requirements. This approach also enhances transparency, builds trust with stakeholders, and aligns supplier conduct with international environmental norms and corporate responsibility goals.

6.13 Supplier Environmental Awareness

SSMI-AD recognizes that environmental sustainability begins with awareness and knowledge. All suppliers are expected to demonstrate adequate environmental competence through staff training, awareness programs, and adherence to environmental management systems. Suppliers must maintain documented procedures for handling materials, preventing pollution, and reducing resource consumption. SSMI-AD encourages suppliers to participate in capacity-building initiatives, knowledge-sharing sessions, and continuous improvement programs. Preference will be given to suppliers who actively integrate environmental practices into their daily operations, maintain certifications such as ISO 14001, and demonstrate measurable improvements in reducing their environmental footprint across the supply chain.

6.14 Ethical Mineral Sourcing

SSMI-AD strictly prohibits the procurement of minerals linked to armed conflict, human rights abuses, or unethical practices. Suppliers sourcing tin, tungsten, tantalum, gold, or cobalt must comply with OECD Due Diligence Guidelines and provide conflict-free sourcing declarations. All suppliers must trace and disclose mineral origins, ensuring they are not funding armed groups or contributing to reputational or legal risks. SSMI-AD reserves the right to suspend or terminate relationships with suppliers failing to comply with conflict mineral regulations. Partnerships will focus on building a responsible, transparent supply chain free of human rights violations and environmental exploitation.

6.15 On-Site Compliance Reviews

SSMI-AD conducts periodic on-site or virtual audits of key suppliers to validate their compliance with environmental standards and contract clauses. These audits assess environmental management systems, pollution controls, resource efficiency, and legal compliance. Audits may be scheduled or surprise visits, depending on the supplier's risk rating. Findings are documented in audit reports that highlight strengths, weaknesses, and areas needing improvement. Suppliers are required to implement corrective actions within defined timelines. The audit process reinforces transparency and accountability, informs future procurement decisions, and serves as an essential component of ongoing supplier monitoring and development.

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6.16 Waste Reduction Commitment

Circular economy principles form a key component of SSMI-AD's sustainable procurement approach. Suppliers must demonstrate commitment to reuse, recycling, and remanufacturing practices, reducing reliance on virgin raw materials. Packaging waste must be minimized, with emphasis on recyclable or returnable solutions. Suppliers are expected to collaborate with SSMI-AD on initiatives promoting closed-loop systems, material recovery, and product take-back schemes. Transparency in waste management reporting and measurable progress in reducing landfill contributions will be evaluated. Preference will be given to suppliers who actively align with circular economy models, contributing to reduced waste generation, resource efficiency, and sustainable value chains.

6.17 Worker Input Mechanism

SSMI-AD ensures that supplier workers and affected communities can report environmental or human rights concerns through accessible grievance mechanisms. These may include anonymous hotlines, suggestion boxes, or digital platforms. Feedback is treated confidentially and investigated fairly, with protection from retaliation guaranteed. The aim is to provide a safe and trusted channel for stakeholder concerns to be heard and addressed promptly. By fostering open communication and ensuring timely resolution of issues, SSMI-AD promotes transparency, early risk identification, and continuous improvement in supplier ESG performance. These mechanisms also uphold the rights and dignity of all supply chain participants.

6.18 Buyer ESG Integration

SSMI-AD embeds sustainable procurement goals into the key performance indicators (KPIs) and annual reviews of its procurement staff. These objectives include improving supplier ESG outcomes, increasing ESG clause adoption, and strengthening supplier engagement on sustainability. Buyer evaluations are based on their contribution to responsible sourcing and environmental risk mitigation. By integrating ESG criteria into individual performance metrics, SSMI-AD ensures procurement professionals are aligned with broader sustainability goals. This approach enhances accountability, drives behavioral change, and ensures that ESG priorities are fully embedded in procurement decisions and business outcomes.

6.19 Chemical Management REACH

SSMI-AD requires all suppliers to comply with the EU REACH regulation, Indian environmental laws, and other applicable chemical safety standards. Suppliers must not use banned or restricted substances and must ensure chemical transparency by providing Material Safety Data Sheets (MSDS), test reports, and declarations. Proper labeling, storage, and handling of chemicals are mandatory. Suppliers must implement systems to identify, assess, and mitigate risks from hazardous substances across the supply chain. Preference will be given to suppliers who demonstrate chemical substitution, use of green chemistry, and ongoing compliance audits, ensuring safe, responsible procurement for SSMI-AD's operations.

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7. ESG Objectives

1. Sustainability Issue

Objective

Measure

Target Value

: Responsible Natural Resources

: Ensure efficient and responsible use of natural resources

: % of raw materials responsibly sourced

: 70% ↑

2. Sustainability Issue

Objective

Measure

Target Value

: Social Impact Training

: Build supplier capacity on social and environmental impact

: No. of training sessions conducted

: 8 ↑

3. Sustainability Issue

Objective

Measure

Target Value

: Environmental Laws and Standards

: Improve supplier compliance with applicable environmental regulations

: % of suppliers compliant

: 65% ↑

4. Sustainability Issue

Objective

Measure

Target Value

: Sustainable Sourcing Practices

: Increase procurement from sustainable sources

: % of sustainable suppliers

: 75% ↑

5. Sustainability Issue

Objective

Measure

Target Value

: Supplier Risk Evaluation

: Conduct periodic ESG risk assessments of suppliers

: No. of suppliers assessed

: 25 ↑

6. Sustainability Issue

Objective

Measure

Target Value

: Eco-Social Supplier Audit

: Strengthen supplier ESG monitoring through audits

: No. of audits conducted

: 3 ↑

7. Sustainability Issue

Objective

Measure

Target Value


: Environmental Responsibility Activities

: Encourage supplier participation in eco-initiatives

: No. of supplier activities conducted

: 7 ↑

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8. Sustainability Issue

: Hazardous Waste Management

Objective

: Reduce environmental risks from hazardous waste

Measure

: % reduction in hazardous waste generated

Target Value

: 10% ↓

9. Sustainability Issue

: Responsible Sourcing Assessment

Objective

: Strengthen oversight of sourcing practices

Measure

: No. of sourcing assessments completed

Target Value

: 15 ↑

10.Sustainability Issue

: Minimizing Environmental Impact

Objective

: Reduce negative impact of supply chain on environment

Measure

: % reduction in emissions/waste

Target Value

: 5% ↓

11.Sustainability Issue

: Supplier Recognition Scheme

Objective

: Reward suppliers for strong ESG performance

Measure

: No. of suppliers recognized

Target Value

: 6 ↑

12.Sustainability Issue

: Ethical Sourcing Clauses

Objective

: Integrate ESG clauses into supplier contracts

Measure

: % of contracts with ESG clauses

Target Value

: 100% ↑

13.Sustainability Issue

: Supplier Environmental Awareness

Objective

: Improve supplier understanding of sustainability

Measure

: % of suppliers trained

Target Value

: 100% ↑

14.Sustainability Issue

: Ethical Mineral Sourcing

Objective

: Ensure minerals are sourced responsibly

Measure

: % of conflict-free minerals sourced

Target Value

: 100% ↑

15.Sustainability Issue

: On-Site Compliance Reviews

Objective

: Strengthen monitoring of supplier operations


Measure

: No. of compliance site reviews

Target Value

: 60 ↑

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16.Sustainability Issue

: Waste Reduction Commitment

Objective

: Minimize supplier waste generation

Measure

: % waste reduced

Target Value

: 5% ↓

17.Sustainability Issue

: Worker Input Mechanism

Objective

: Enhance worker participation in ESG initiatives

Measure

: No. of worker feedback sessions

Target Value

: 5 ↑

18.Sustainability Issue

: Buyer ESG Integration

Objective

: Embed ESG into all procurement decisions

Measure

: % of tenders with ESG criteria

Target Value

: 100% ↑

19. Sustainability Issue

: Chemical Management REACH

Objective

: Ensure safe handling of chemicals in supply chain

Measure

: % of suppliers REACH compliant

Target Value

: 65% ↑

8. Applicable Standards, Laws, and Acts

- Conflict Free Smelter Initiative (CFSI)
- Aluminum Stewardship Initiative (ASI)
- UN Global Compact Principles
- OECD Guidelines for Multinational Enterprises
- Global Reporting Initiative (GRI) Standards
- REACH Regulation (EU)
- Indian Environmental Protection Laws and regulations (e.g., Environment Protection Act, 1986)
- Local labor and safety laws applicable to suppliers

9. Distribution and Annual Review

This policy will be distributed to all procurement and supply chain personnel, suppliers, and contractors to ensure clear understanding and compliance. It will be accessible through the company intranet and supplier portals for easy reference. Annual training sessions will be conducted to communicate policy requirements and updates. The Sustainability & Procurement Committee will review the policy annually, incorporating changes in laws, industry best practices, and company performance outcomes.

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Any revisions or improvements will be promptly communicated to all relevant stakeholders to maintain alignment and transparency. This ensures continuous improvement and reinforces SSMI-AD's commitment to sustainable and responsible procurement practices.

10. Disciplinary Action for Violators

Non-compliance with this policy will lead to appropriate disciplinary measures. Suppliers violating the guidelines may receive warnings, face contract suspension, or have agreements terminated, depending on the severity of the breach. Internal employees who fail to follow the policy will be subject to disciplinary actions in accordance with SSMI-AD's HR policies. In cases involving serious misconduct or legal violations, matters may be escalated and reported to relevant authorities. These actions ensure accountability and reinforce the importance of ethical, sustainable procurement aligned with legal obligations and corporate values.

11. Reporting Mechanism

SSMI-AD provides a confidential reporting mechanism for employees and suppliers to raise concerns or report policy violations. Reports can be submitted via a dedicated whistleblower hotline or secure email. All reported issues will be investigated promptly and addressed through appropriate corrective actions. SSMI-AD ensures that whistleblowers are protected against retaliation, maintaining trust in the process. Additionally, procurement performance, including compliance with this policy, will be transparently shared through annual sustainability reports. This reinforces SSMI-AD's commitment to responsible practices, continuous improvement, and transparency across its supply chain operations.

12. Conclusion

SSMI-AD remains fully committed to sustainable procurement by embedding environmental stewardship, social responsibility, and ethical conduct into its sourcing practices. The company aims to foster long-term supplier partnerships, promote circular economy principles, and minimize environmental impacts throughout its supply chain. Through clear standards, annual reviews, ongoing training, and robust monitoring, SSMI-AD ensures policy effectiveness and alignment with evolving ESG expectations. By engaging all stakeholders and encouraging transparent communication, SSMI-AD strengthens its resilience, supports compliance, and upholds the highest standards of sustainability in all procurement and supply chain activities.

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23. Workplace Communication Channels Policy

SSMI-AD/ESG/POLICY-23

1. Purpose

To establish a structured approach for engaging in meaningful social dialogue with employees, their representatives, and relevant stakeholders. This aims to promote collective bargaining, address employee concerns, improve working conditions, and align with ESG and international labor standards.

2. Scope of Application

The labor relations policy applies to all employees, management, labor unions, works councils, and designated employee representatives within SSMI-AD. It covers every business area including manufacturing, support services, and administrative operations. Geographically, the policy is applicable to all SSMI-AD locations across India and extends to international subsidiaries and operational partners, wherever relevant labor practices are engaged.

3. Governance

Oversight of labor relations lies with the Human Resources & ESG Steering Committee. The Social Dialogue Officer, appointed by the HR Head, leads policy implementation and engagement efforts. The Internal ESG Compliance Team, in consultation with third-party auditors when necessary, is responsible for periodic review and compliance verification of labor practices.

4. Definition of Terms

✿ Social Dialogue

Social dialogue refers to all forms of negotiation, consultation, or exchange of information between or among employers, employees, and their representatives. It plays a key role in fostering mutual understanding, preventing conflicts, and promoting inclusive workplace policies, contributing to stable industrial relations and improved organizational performance.

✿ Collective Bargaining

Collective bargaining is the formal process through which employers and employee representatives negotiate terms of employment, such as wages, working hours, benefits, and workplace conditions. It aims to achieve mutually agreed outcomes and ensure fair treatment, equity, and shared responsibility between management and workforce stakeholders.

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✿ Work Council/Union

A work council or union is a recognized body representing employee interests in workplace matters. It facilitates dialogue with management, safeguards labor rights, and contributes to organizational decision-making. Such bodies enhance employee voice, support dispute resolution, and ensure that labor standards and legal compliance are consistently maintained.

5. Roles and Responsibilities

✿ HR Department

The HR Department plays a central role in enabling effective social dialogue by coordinating communication channels between management and employee representatives. It ensures that discussions are structured, inclusive, and aligned with legal and organizational standards, while also maintaining documentation and follow-up actions to strengthen employee relations and workplace harmony.

✿ Line Managers

Line Managers act as vital communication links between employees and senior management. They are responsible for fostering an open feedback environment within teams, identifying and escalating workplace concerns, and supporting constructive dialogue. Their proactive engagement ensures that employee voices are heard and addressed in a timely and respectful manner.

✿ Employees/Representatives

Employees and their elected representatives are expected to actively engage in dialogue platforms such as meetings, consultations, and surveys. They provide valuable feedback, voice collective concerns, and collaborate with management on workplace improvements. Their involvement strengthens mutual trust and contributes to fair and transparent employment practices.

✿ ESG Committee

The ESG Committee oversees the integration of social dialogue into broader sustainability and governance frameworks. It monitors the implementation of employee engagement mechanisms, evaluates risks, and intervenes when critical labor concerns are escalated. The committee ensures alignment between workforce feedback and the organization's ethical, social, and governance commitments.

6. Workplace Communication Channels Policy

6.1 Effective Collective Bargaining

SSMI-AD views collective bargaining as a constructive process that balances organizational goals with employee welfare. In instances where bargaining processes are ineffective, we will take proactive steps to support and enhance them.

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This includes encouraging transparency, building negotiation capabilities, and facilitating open discussions between management and worker representatives. By fostering mutual respect and trust, we aim to resolve conflicts amicably, define clear terms of employment, and set collaborative performance standards. These efforts are aligned with our commitment to labor rights and our ESG values, ensuring that collective bargaining delivers fair outcomes and strengthens industrial harmony.

6.2 Safe Workplace Deal

SSMI-AD strictly prohibits discrimination and harassment in any form and upholds workplace dignity through collective agreements developed with employee representatives. These agreements outline preventive strategies, confidential reporting channels, impartial investigations, and fair remediation procedures. They ensure protection across dimensions such as gender, caste, religion, age, disability, and sexual orientation. Awareness sessions, training programs, and policy communication campaigns are jointly implemented to educate all stakeholders. The agreements also enable joint oversight mechanisms to address issues promptly and effectively. By institutionalizing these protections, SSMI-AD cultivates a respectful, inclusive, and psychologically safe workplace where diversity is not only accepted but celebrated.

6.3 Suppression of Worker Concerns or Fear of Retaliation

SSMI-AD enforces a strict zero-tolerance policy against any form of retaliation or suppression of employee concerns. We are committed to fostering an open and psychologically safe environment where employees can report grievances or express ideas without fear. Multiple confidential channels, including anonymous helplines and grievance boxes, are available for workers to raise issues. All reports are treated with seriousness, and investigations are conducted impartially. We train management to respond supportively and reinforce that retaliation will be met with disciplinary action. This protective environment strengthens trust, empowers employees, and upholds our values of dignity and human rights.

6.4 Employee Time Contract

SSMI-AD safeguards fair labor practices by negotiating collective agreements on working hours, overtime limits, and leave policies. These agreements ensure that no employee is subjected to excessive work hours and that leave entitlements are equitable and accessible. Developed in alignment with labor laws, the agreements promote work-life balance, reduce burnout risks, and support employee wellness. Through regular joint reviews, we assess implementation effectiveness, make necessary amendments, and address emerging challenges. Transparent communication and record-keeping ensure accountability from both parties. These agreements reflect our commitment to human dignity, decent work conditions, and sustainable productivity.

6.5 Geographical Disparities in Dialogue Mechanisms

Recognizing the diverse legal and cultural contexts across different regions, SSMI-AD is committed to establishing consistent yet locally relevant dialogue mechanisms across all sites. We will tailor these mechanisms in accordance with national labor laws while upholding our internal standards for inclusivity, transparency, and employee empowerment.

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Whether in urban manufacturing hubs or remote operations, each site will benefit from structured dialogue platforms that ensure every employee's voice is valued. Central oversight will ensure harmonization, while local adaptation will guarantee compliance and cultural appropriateness. This approach ensures no employee is left out of critical conversations.

6.6 Negotiated Learning Agreement

SSMI-AD believes in shared responsibility for career growth and invests in employee development through collectively bargained agreements on training and upskilling. These agreements include defined goals, training eligibility, promotion pathways, and learning outcomes, co-created by management and employee representatives. Implementation is tracked through regular feedback and performance evaluations. Training opportunities are inclusive, equitable, and aligned with both individual aspirations and business needs. Career progression discussions are encouraged at all levels, ensuring that employees feel supported in achieving their professional goals. This collective approach strengthens workforce capability, enhances employee morale, and drives organizational excellence.

6.7 Labor Relations Council

SSMI-AD acknowledges the vital role of employee representation in building a fair and communicative workplace. We support the formation of democratic bodies such as labor unions, works councils, or peer-elected employee committees across all operational sites. These bodies serve as a formal channel for voicing workforce concerns, influencing decisions on employment conditions, and enhancing workplace well-being. Regular engagements between representatives and management are institutionalized to foster trust, transparency, and cooperation. We ensure these representatives are empowered with adequate access to information and resources, enabling them to participate meaningfully in organizational development and employee welfare initiatives.

6.8 Employee Engagement or Participation

SSMI-AD acknowledges that robust employee engagement is the cornerstone of meaningful social dialogue. When employees actively participate in dialogue platforms, they help shape a workplace that reflects their needs, promotes mutual respect, and fosters continuous improvement. To address low engagement, SSMI-AD is committed to creating inclusive, accessible communication platforms such as joint consultative committees, grievance redress forums, periodic townhalls, and digital suggestion tools. Management will ensure two-way communication, act on feedback promptly, and reinforce the value of employee voice through recognition and response. This participatory culture helps build trust and drives better organizational outcomes.

6.9 Contracted Wage Rates

SSMI-AD is committed to wage fairness through structured collective bargaining with employee representatives. These agreements are developed based on national wage laws, inflation trends, cost-of-living indices, and industry benchmarks. They are periodically reviewed and adjusted to maintain economic parity and uphold financial dignity for all employees. Wage structures are made transparent, eliminating bias and inequality. SSMI-AD also ensures that the lowest wages meet or exceed legal minimums across locations. Our approach ensures just compensation, reduces income-related grievances, and builds long-term trust between employees and management. This fosters a financially secure workforce and supports inclusive growth.

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6.10 Absence or Weak Labor Representation

In areas where union presence is limited or absent, SSMI-AD will actively promote alternative mechanisms to ensure workers' representation is not compromised. The company will establish recognized employee forums, including peer-elected councils, which function as legitimate platforms for dialogue on core issues such as wages, health and safety, and workplace improvements. These forums will be structured to allow regular interaction with management and ensure fair representation across departments and job roles. SSMI-AD believes that empowering employees through structured dialogue—whether unionized or not—strengthens the organization's social fabric and fosters a more equitable and collaborative work environment.


6.11 Labor Safety Agreement

SSMI-AD prioritizes employee health and safety by embedding it into collective bargaining agreements with recognized employee representatives. These agreements outline mutual responsibilities, safety protocols, risk controls, and emergency preparedness measures, ensuring a proactive and collaborative approach. Developed in compliance with national laws and international standards, they include mechanisms for continuous review and improvement. Joint implementation and oversight committees, comprising both management and employees, are formed to monitor progress, conduct safety audits, and address concerns. This cooperative model enhances occupational safety outcomes while reinforcing a shared commitment to protecting every worker's physical and mental well-being.

7. ESG Objectives

- | | |
|---|--|
| 1. Sustainability Issue
Objective
Measure
Target Value | : Effective Collective Bargaining
: Strengthen collective bargaining processes
: % of workforce covered by collective agreements
: ↑ 65% |
| 2. Sustainability Issue
Objective
Measure
Target Value | : Safe Workplace Deal
: Ensure worker input in safety agreements
: No. of formal safety agreements signed with workers
: ↑ 2 |
| 3. Sustainability Issue
Objective
Measure
Target Value | : Suppression of Worker Concerns or Fear of Retaliation
: Promote open expression without fear
: % employees aware of non-retaliation policy
: ↑ 65% |
| 4. Sustainability Issue
Objective
Measure
Target Value | : Employee Time Contract
: Ensure transparency in contract terms
: % time-bound employees receiving full contract briefings
: ↑ 65% |

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5. Sustainability Issue : Geographical Disparities in Dialogue Mechanisms

Objective : Standardize dialogue mechanisms across locations
Measure : % units with functional dialogue platforms
Target Value : ↑ 75%

6. Sustainability Issue : Negotiated Learning Agreement

Objective : Establish training through social dialogue
Measure : No. of learning agreements negotiated
Target Value : ↑ 2

7. Sustainability Issue : Labor Relations Council

Objective : Strengthen labor-management dialogue
Measure : No. of Labor Relations Council meetings held
Target Value : ↑ 3

8. Sustainability Issue : Employee Engagement or Participation

Objective : Increase employee involvement in decision-making
Measure : % participation in engagement surveys
Target Value : ↑ 65%

9. Sustainability Issue : Contracted Wage Rates

Objective : Ensure fair and transparent wage contracts
Measure : % of contracts complying with wage benchmarks
Target Value : ↑ 70%

10. Sustainability Issue : Absence or Weak Labor Representation

Objective : Facilitate the formation of worker committees
Measure : % of sites with active labor representation
Target Value : ↑ 65%

11. Sustainability Issue : Labor Safety Agreement

Objective : Collaborate with employees on safety initiatives
Measure : No. of labor safety agreements signed
Target Value : ↑ 2

8. Applicable Standards, Laws, and Acts

- UN Global Compact (Principle 3: Freedom of Association)
- ILO Conventions No. 87 & 98
- OECD Guidelines for Multinational Enterprises

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- SA8000:2014
- Aluminum Stewardship Initiative (Performance Standards)
- Global Reporting Initiative (GRI 402: Labor/Management Relations)
- Trade Unions Act, 1926
- Industrial Disputes Act, 1947
- Factories Act, 1948
- Code on Social Security, 2020

9. Distribution and Annual Review

SSMI-AD's Social Dialogue Policy is made accessible through the company intranet, HR portal, and included in induction kits for new employees. Key highlights are displayed on notice boards, with regional language versions provided where needed. Periodic training workshops reinforce understanding, ensuring all employees, regardless of role or location, can engage in constructive communication. The ESG Committee and HR Department review the policy annually, evaluating dialogue effectiveness, legal updates, employee feedback, and KPI outcomes. Recommendations are approved by senior management and integrated into the policy, ensuring it remains responsive, legally compliant, and aligned with employee expectations and organizational goals.

10. Disciplinary Action for Violators

SSMI-AD enforces a zero-tolerance policy against any actions that obstruct or retaliate against lawful and constructive social dialogue. Managers, supervisors, or employees found violating this policy may face disciplinary actions such as written warnings, suspension, or even dismissal, depending on the severity of the misconduct. Investigations will be carried out jointly by the HR and Legal departments to ensure objectivity and fairness. This provision underscores the importance SSMI-AD places on maintaining respectful, safe, and inclusive communication channels across the organization and serves as a deterrent against behaviors that undermine collective employee engagement.

11. Reporting Mechanism

To encourage open and confidential communication, SSMI-AD has established multiple reporting mechanisms. Employees can report concerns anonymously through grievance and suggestion boxes or confidentially via the employee helpline. Issues may also be escalated to the Social Dialogue Officer or HR Head. Additionally, the annual "Voice of the Employee" survey provides a structured feedback loop for evaluating workplace sentiment. A digital platform allows real-time reporting of workplace concerns, enabling swift management response. These mechanisms empower employees to raise issues without fear, enhancing transparency and ensuring that management remains responsive to employee needs.

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12. Conclusion

At SSMI-AD, we believe that transparent and inclusive social dialogue is key to building a respectful, fair, and productive workplace. This policy reflects our commitment to fostering an environment where employees are heard, their rights are respected, and mutual trust is cultivated. Beyond legal compliance, our approach is grounded in our ESG-aligned values of dignity, equality, and continuous improvement. We view social dialogue not only as a communication tool but as a strategic framework for strengthening employee relations, improving morale, and driving organizational excellence. By embedding these principles, SSMI-AD ensures that every voice contributes to shaping a better future.

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24. Carbon Emission Policy

SSMI-AD/ESG/POLICY-24

1. Purpose

This policy is designed to measure, manage, reduce, and report greenhouse gas (GHG) emissions from SSMI-AD's operations. Our goal is to minimize our carbon footprint, promote energy efficiency, and align with India's and global climate commitments. Through this, SSMI-AD supports the transition to a low-carbon economy and contributes to long-term sustainability and climate responsibility.

2. Scope of Application

This policy applies to all employees, facility heads, energy managers, sustainability teams, and contractors. It covers all business areas including manufacturing sites, warehouses, recycling units, offices, and logistics operations. The geographical scope spans all operational areas across India, with applicability extended to future expansions, ensuring comprehensive energy and emissions management across SSMI-AD's value chain.

3. Governance

The GHG Oversight Committee, chaired by the Head of ESG, oversees monthly emission monitoring and ensures annual verification and reporting. It facilitates management review and approval of reduction targets and integrates GHG data into the company's broader sustainability and risk management framework, ensuring alignment with strategic environmental goals.

4. Definitions

☀ Scope 1 Emissions

These are direct greenhouse gas emissions from sources owned or controlled by SSMI-AD, such as combustion of fuel in furnaces, boilers, and company-owned vehicles. Managing Scope 1 emissions is critical as they represent a significant share of SSMI-AD's operational footprint and offer immediate reduction opportunities through technology upgrades and fuel switches.

☀ Scope 2 Emissions

These are indirect emissions resulting from the generation of purchased electricity, heat, or steam consumed by SSMI-AD. Though generated externally, they significantly impact the company's carbon footprint. Efforts to reduce Scope 2 emissions include transitioning to renewable energy, improving energy efficiency, and implementing power factor correction techniques.

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GHGs Covered

SSMI-AD measures and manages all seven greenhouse gases covered under the Kyoto Protocol—Carbon Dioxide (CO₂), Methane (CH₄), Nitrous Oxide (N₂O), Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs), and Sulfur Hexafluoride (SF₆). These gases are tracked across all scopes to ensure a comprehensive and compliant GHG inventory.

Carbon Intensity

This refers to the amount of GHG emissions produced per unit of output (e.g., per ton of alloy or per unit of revenue). Monitoring carbon intensity helps SSMI-AD track decarbonization progress relative to business growth, enabling targeted improvements without compromising productivity or profitability.

Carbon Offset

A carbon offset represents a verified reduction in GHG emissions achieved through external projects, such as renewable energy, reforestation, or methane capture. SSMI-AD uses carbon offsets to compensate for residual emissions that are difficult to eliminate, ensuring progress toward net-zero goals with full traceability and third-party validation.

5. Roles and Responsibilities

Top Management

Top Management at SSMI-AD plays a strategic role in combating climate change by approving the organization's GHG reduction strategy, setting emission targets, and allocating necessary financial and human resources. They ensure that GHG management aligns with corporate objectives and ESG commitments. Leadership also participates in performance reviews, risk assessments, and public disclosures. Their visible commitment drives accountability across all levels and ensures that sustainability remains a top priority in business decision-making and operational execution.

ESG Committee

The ESG Committee is responsible for overseeing the implementation of SSMI-AD's GHG emissions management strategy. It ensures regulatory compliance, stakeholder alignment, and timely internal and external reporting. The committee reviews emissions data, validates reduction initiatives, and integrates GHG goals into broader ESG and risk management frameworks. It conducts regular meetings to assess progress, approve corrective actions, and ensure continuous improvement. It serves as the governance body ensuring transparency, accountability, and ethical oversight in all climate-related activities.

Energy & Environment Officers

Energy and Environment Officers at SSMI-AD are responsible for day-to-day monitoring, tracking, and reporting of GHG emissions across all operations. They ensure data accuracy, maintain compliance with international standards (like ISO 14064), and support audit readiness. Their role includes identifying emission sources, coordinating energy audits, recommending mitigation measures, and assisting in implementation of emission reduction technologies. These officers also liaise with departments and external stakeholders to promote a low-carbon culture across the organization.

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Employees

Employees at all levels contribute significantly to the success of GHG reduction efforts. They are expected to follow energy-efficient practices, minimize waste, and use equipment responsibly to reduce emissions. Employees must also report operational inefficiencies, equipment malfunctions, or any practices that may lead to unnecessary emissions. Awareness sessions and training help empower them to recognize their role in climate action. An engaged workforce ensures that sustainability is embedded in daily activities, making GHG targets achievable.

6. Carbon Emission Policy

6.1 Electricity-Driven Scope 2 Emissions

SSMI-AD is committed to lowering Scope 2 emissions arising from electricity use. To this end, the company will gradually shift to renewable energy sources and optimize electricity usage across all facilities. Investments in solar panels, LED lighting, and energy-efficient motors will reduce dependency on grid-based fossil fuel power. These measures will not only reduce indirect emissions but also improve operational cost-efficiency and enhance SSMI-AD's environmental performance in line with India's clean energy transition.

6.2 Climate Impact Audit

At SSMI-AD, regular carbon and energy audits are conducted to evaluate greenhouse gas emissions from our facilities, offices, and logistics operations. These assessments form the foundation of our climate action strategy by identifying major sources of Scope 1, 2, and relevant Scope 3 emissions. The findings guide emission reduction planning, efficiency upgrades, and process optimization. Carbon audits are aligned with national regulatory requirements and international frameworks like the GHG Protocol. External experts may be engaged to ensure objective evaluations. The audit results are reported to the ESG Committee and senior management, forming a critical input for policy review and capital planning.

6.3 GHG Data and Monitoring

Reliable data is foundational to climate action. SSMI-AD will conduct annual GHG inventories in line with ISO 14064 and GRI 305 to ensure accurate emissions tracking. These inventories will cover all operational units and feed into target-setting, performance evaluation, and disclosures. A robust data monitoring framework ensures transparency, facilitates third-party verification, and enables continuous improvement in GHG reduction efforts while building stakeholder trust through verified sustainability reporting.

6.4 Transportation Emissions from Fuel Use

SSMI-AD's transport activities contribute to Scope 1 emissions through fuel consumption in delivery vehicles and logistics operations. The company will improve route optimization, reduce idling time, and switch to low-emission and electric vehicles. SSMI-AD will also explore alternative fuels and ensure efficient vehicle maintenance. These efforts aim to decrease fuel use, lower emissions, and improve supply chain sustainability in alignment with SSMI-AD's climate and energy objectives.

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6.5 Carbon Storage Solutions

As part of its long-term sustainability roadmap, SSMI-AD is investing in Carbon Capture and Storage (CCS) technology to mitigate emissions from metallurgical processes. CCS involves capturing carbon dioxide at emission sources, compressing it, and storing it in suitable geological formations or utilizing it in industrial applications. We are evaluating pilot projects and partnerships with technology providers to test the feasibility of CCS integration into our high-emission units such as smelting and acid treatment. This technology will complement our energy efficiency and fuel-switching strategies. Through CCS, SSMI-AD aspires to lead innovation in decarbonizing the non-ferrous alloy manufacturing sector.

6.6 Carbon Reduction Training

SSMI-AD recognizes that an informed and engaged workforce is essential for sustainable operations. We conduct regular training sessions to educate employees on energy conservation, climate change mitigation, and efficient resource use. Training modules cover best practices in operations, equipment handling, and emissions reduction strategies. These programs also include updates on company SOPs aligned with climate goals and national energy efficiency initiatives. All employees involved in production, logistics, and facility management are required to undergo these sessions. Feedback mechanisms and assessments are integrated to measure knowledge retention and continuously improve training content in line with evolving sustainability priorities.

6.7 Limited Use of Secondary (Recycled) Material

SSMI-AD understands that primary metal production is energy-intensive and carbon-heavy. To address this, the company will increase the use of recycled non-ferrous inputs, which emit significantly less CO₂. By integrating recycling into its material sourcing and production planning, SSMI-AD supports circular economy principles and drastically lowers energy demand. This initiative will also help conserve natural resources while establishing a more sustainable, low-carbon production model for alloy manufacturing.

6.8 High Carbon Content in Raw Materials

SSMI-AD acknowledges the emission risks associated with high-carbon raw materials. The company will enforce material screening protocols to assess carbon intensity and blend high-carbon input with lower-carbon recycled scrap. This strategy enables early-stage emission control and lowers GHG output during processing. By adopting source-based mitigation, SSMI-AD strengthens its ability to meet emission reduction goals and promotes responsible sourcing that aligns with sustainability and resource efficiency principles.

6.9 Alternative Fuel Adoption

SSMI-AD is transitioning towards cleaner, more efficient fuel sources to lower the carbon footprint of our operations. This fuel-switching initiative includes replacing high-carbon fuels like coal or furnace oil with alternatives such as natural gas, biomass, or renewable electricity. The shift is implemented in phases across manufacturing and utility systems to ensure safety, efficiency, and compliance.

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Each project is preceded by technical and financial feasibility assessments. Fuel-switching aligns with India's national decarbonization strategy and supports our broader ESG goals. The transition is overseen by the ESG and Operations teams, with continuous monitoring of environmental and operational performance.

6.10 Sufficient Employee Awareness

SSMI-AD believes that informed employees are critical to achieving its GHG goals. The company will implement training programs on emissions awareness, energy conservation, and climate-friendly practices across all departments. By fostering a culture of sustainability, employees will be empowered to identify emission reduction opportunities and participate in achieving company-wide environmental targets. Training will be interactive and ongoing, ensuring that GHG policy knowledge is continuously reinforced and applied in daily operations.

6.11 High GHG Emissions from Primary Production

SSMI-AD recognizes that smelting and refining processes generate significant Scope 1 emissions. To mitigate this, the company will adopt low-emission technologies, enhance combustion systems, and ensure quality control of raw materials. Sealed furnaces and CO₂ capture technologies will be implemented to reduce fugitive emissions. These efforts are intended to enhance operational efficiency, minimize environmental harm, and support the company's broader goal of achieving measurable carbon reductions across its primary production activities.

6.12 Efficient Energy Recovery


SSMI-AD actively explores energy-efficient technologies such as Waste Heat Recovery Systems (WHRS) and Combined Heat and Power (CHP) units. These technologies capture residual heat from industrial processes and convert it into useful energy, improving efficiency and reducing greenhouse gas emissions. WHRS and CHP deployment is prioritized in high-temperature operations such as smelting and casting. These systems not only reduce dependency on external energy sources but also support cost savings and long-term operational resilience.

6.13 GHG Emission Reporting Frequency: Annually

7. ESG Objectives

1. Sustainability Issue	: Electricity-Driven Scope 2 Emissions
Objective	: Reduce indirect emissions from electricity use
Measure	: % reduction in Scope 2 emissions
Target Value	: ↓ 5%
2. Sustainability Issue	: Climate Impact Audit
Objective	: Conduct regular climate audits
Measure	: No. of climate audits conducted
Target Value	: ↑ 1/year

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- | | |
|--|---|
| 3. Sustainability Issue
Objective
Measure
Target Value | : GHG Data and Monitoring
: Improve GHG tracking and data accuracy
: % units with active GHG monitoring systems
: ↑ 65% |
| 4. Sustainability Issue
Objective
Measure
Target Value | : Transportation Emissions from Fuel Use
: Reduce fuel-based transportation emissions
: % reduction in transportation fuel emissions
: ↓ 5% |
| 5. Sustainability Issue
Objective
Measure
Target Value | : Carbon Storage Solutions
: Explore carbon capture or storage options
: No. of projects initiated
: ↑ 1 |
| 6. Sustainability Issue
Objective
Measure
Target Value | : Carbon Reduction Training
: Train employees in carbon-saving practices
: % employees trained
: ↑ 90% |
| 7. Sustainability Issue
Objective
Measure
Target Value | : Limited Use of Secondary (Recycled) Material
: Increase recycled input in production
: % of recycled material used
: ↑ 15% |
| 8. Sustainability Issue
Objective
Measure
Target Value | : High Carbon Content in Raw Materials
: Source low-carbon raw materials
: % of procurement from low-carbon suppliers
: ↑ 15% |
| 9. Sustainability Issue
Objective
Measure
Target Value | : Alternative Fuel Adoption
: Introduce renewable or low-emission fuels
: % of fuel mix from alternative sources
: ↑ 5% |
| 10. Sustainability Issue
Objective
Measure
Target Value | : Sufficient Employee Awareness
: Improve GHG awareness across workforce
: % awareness score from employee survey
: ↑ 65% |

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11.Sustainability Issue : High GHG Emissions from Primary Production

Objective : Lower emissions from core manufacturing
Measure : % reduction in production-related GHG
Target Value : ↓ 10%

12.Sustainability Issue : Efficient Energy Recovery

Objective : Increase waste heat recovery efficiency
Measure : % energy recovered
Target Value : ↑ 12%

8. Applicable Standards, Laws, and Regulations

- ISO 14001: Environmental Management System
- ISO 14064: GHG Accounting & Verification
- Carbon Disclosure Project (CDP)
- Global Reporting Initiative (GRI 305)
- Aluminium Stewardship Initiative (ASI) Performance Standard
- UN Global Compact Principles 7–9
- OECD Guidelines for Multinational Enterprises
- India's Environment (Protection) Act, 1986
- Energy Conservation Act, 2001

9. Distribution and Annual Review

SSMI-AD's GHG Emissions Policy is circulated across all departments and made accessible via the internal communication portal. It is included in employee induction kits and embedded in vendor contracts to ensure alignment across the supply chain. External stakeholders are informed through ESG reports, the corporate website, and sustainability disclosures. The policy is reviewed annually by the ESG Committee, incorporating regulatory changes, audit results, emission data, and operational updates. Revisions are approved by top management to maintain alignment with climate goals and stakeholder expectations. This ensures the policy remains effective, transparent, and central to SSMI-AD's sustainability strategy.

10. Disciplinary Action for Policy Violators

Violations of this GHG Emissions Policy by employees or departments will be taken seriously. Disciplinary measures may include formal written warnings, temporary suspension from responsibilities, mandatory retraining, and in some cases, financial penalties for breaching legal emission limits. In instances of intentional falsification of emission data or gross negligence, the employee may be subject to termination. All disciplinary actions will be handled in accordance with SSMI-AD's HR and compliance protocols, ensuring fairness and reinforcing the importance of accountability in our climate responsibility journey.

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11. Reporting Mechanism

SSMI-AD has established a confidential reporting mechanism to encourage transparency and integrity in its GHG emissions practices. Employees and stakeholders can report suspected emission misreporting, GHG-related safety risks, or policy non-compliance through a dedicated whistleblower portal or internal reporting channels. Each report will be acknowledged and investigated by the ESG Compliance Cell within seven working days. Findings will be documented, and corrective actions will be taken if necessary. This mechanism empowers individuals to contribute to climate integrity and ensures that emission management practices are robust, transparent, and trustworthy.

12. Conclusion

Through this ESG Policy on GHG Emissions, SSMI-AD affirms its commitment to climate action, operational excellence, and responsible growth. By integrating reduction strategies, adopting clean technologies, and engaging employees and partners, SSMI-AD aims to significantly reduce its carbon footprint. This policy is a cornerstone of our ESG agenda and reflects our aspiration to lead the non-ferrous alloy sector toward a more sustainable, low-carbon future. With continuous monitoring, stakeholder involvement, and compliance focus, SSMI-AD positions itself as a resilient and environmentally responsible organization.

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25. Customer Safety Protocols Policy

SSMI-AD/ESG/POLICY-25

1. Purpose

SSMI-AD ensures that all delivered products, including non-ferrous alloy ingots, are safe for customers and downstream users. We proactively manage health and safety throughout product design, manufacturing, and delivery, adhering to stringent standards. By minimizing potential harm and embedding safety into every stage, we aim to protect users, ensure compliance, and foster long-term trust and reliability.

2. Scope of Application

This policy applies to all SSMI-AD employees involved in product design, manufacturing, quality assurance, logistics, and customer service. It covers operations such as manufacturing, material testing, packaging, transport, and customer advisory functions. The geographical scope includes all SSMI-AD facilities and operations within India, as well as activities related to products exported to international markets.

3. Governance

The Board of Directors provides strategic oversight for product safety commitments. The Safety & Product Compliance Committee serves as the policy custodian, overseeing product testing and corrective actions. The Quality Control (QC) Team conducts batch testing, safety assessments, and ensures compliance with BIS and other certifications. The Customer Support Team handles safety-related inquiries and manages incident responses.

4. Definitions

🌟 Customer Health & Safety

SSMI-AD prioritizes customer well-being by actively minimizing health and safety risks associated with handling, storing, or using its non-ferrous alloy ingots. Our processes focus on safe product design, user guidance, and robust safety controls to reduce the likelihood of accidents, injuries, or misuse in downstream applications.

🌟 Hazard

A hazard refers to any inherent physical, chemical, or mechanical property or condition of a product that has the potential to cause injury or harm. At SSMI-AD, identifying and mitigating hazards is a critical part of our quality and safety assurance processes, including raw material selection, formulation, and manufacturing.

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Risk Assessment

Risk assessment is the structured process SSMI-AD uses to identify, evaluate, and prioritize potential safety hazards associated with its products and processes. This evaluation helps implement preventive measures, establish controls, and ensure compliance with safety standards to protect users across the value chain from foreseeable risks.

Adverse Event

An adverse event is a confirmed or suspected incident where the use or handling of an SSMI-AD product results in customer harm, injury, or property damage. Such events trigger immediate investigation, corrective actions, and communication to affected stakeholders, ensuring continuous safety improvements and transparency.

5. Roles & Responsibilities

QC Team

The Quality Control (QC) Team is responsible for conducting rigorous product testing, verifying compliance with national and international safety standards, and investigating any product-related incidents. They play a vital role in maintaining product integrity, supporting certifications, and implementing corrective actions when deviations from safety expectations are identified.

Manufacturing Operations

Manufacturing Operations integrate safety controls at every stage of production, including machinery use, process parameters, and packaging. Their role ensures that products are manufactured in environments that minimize risk to both workers and end-users, contributing to the delivery of safe and defect-free non-ferrous alloy ingots.

Procurement Team

The Procurement Team sources raw materials only from suppliers that meet recognized safety, health, and environmental standards. Their due diligence ensures that inputs do not introduce hazards into the production process and that suppliers comply with legal and ESG-based product safety requirements.

Customer Support

Customer Support acts as the first point of contact for product safety concerns. They respond to safety-related inquiries or incident reports from clients, provide technical guidance for safe product use, and coordinate with internal teams to ensure timely remediation and resolution.

ESG Committee

The ESG Committee periodically reviews safety-related data and performance indicators, assesses risk trends, and approves necessary improvements to product safety practices. It provides oversight by reporting significant safety developments and recommendations to the Board of Directors for strategic decision-making and policy updates.

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6. Customer Safety Protocols Policy

6.1 Contaminated Raw Materials

SSMI-AD takes stringent measures to ensure the raw materials used in manufacturing are safe and compliant. All incoming raw material batches are procured only from BIS-certified suppliers and are tested for hazardous contaminants, including heavy metals like lead and cadmium. This preemptive measure ensures the safety of downstream customers and protects public health. Through our quality control systems, SSMI-AD prevents contaminated materials from entering production lines, thus reinforcing our product integrity and aligning with national and international safety regulations. Documentation and traceability procedures support supplier accountability and continual compliance.

6.2 Adequate Testing for Product Integrity

Each batch of non-ferrous alloy ingots produced by SSMI-AD is subjected to rigorous mechanical and chemical testing to verify conformity with relevant Indian Standards (IS) before release. This testing protocol ensures the structural integrity and safety of products used in customer operations. In case any ingot batch fails to meet the criteria, it is immediately quarantined and investigated. This comprehensive quality control minimizes customer risk and upholds our commitment to product safety, particularly for industries where material reliability is crucial, such as automotive, electrical, and manufacturing sectors.

6.3 Sufficient Product Information & Labeling

SSMI-AD recognizes that product safety extends beyond manufacturing to include clear and complete information for end-users. Every shipment includes Safety Data Sheets (SDS), handling instructions, and material specifications to guide customers in the safe use of our ingots. Labels on packaging clearly indicate alloy type, weight, hazard notices (if any), and batch traceability information. This ensures that customers can identify, store, and use the product safely and effectively. Additionally, documentation is reviewed periodically to align with new standards or emerging safety considerations.

6.4 Safe Packaging and Transport Practices

Proper packaging and transport of ingots are essential to avoid physical injuries, environmental hazards, and material loss. SSMI-AD uses sturdy, impact-resistant packaging materials and clearly labeled shipments to prevent handling risks. Special attention is paid to securing loads for transit using standardized protocols. Collaborations with logistics partners include regular audits and training to ensure safe loading/unloading practices. By maintaining high packaging and transport safety standards, SSMI-AD protects both transport personnel and customers, preventing accidents and ensuring the delivery of intact, compliant goods.

6.5 Customer Advisory on Use Hazards

SSMI-AD proactively educates customers about potential hazards associated with alloy handling, machining, or heating, which could lead to fume generation or exposure to metal particles. Safety advisories are issued alongside products and include clear, actionable recommendations to mitigate such risks.

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For example, we advise the use of appropriate PPE like gloves and respirators during specific operations. These advisories not only improve workplace safety but also reinforce legal compliance and foster trust with customers who rely on accurate and timely safety information.

6.6 Recall safe Batches

In rare instances where safety concerns arise after dispatch, SSMI-AD activates its recall protocol immediately. This process includes customer notification, batch tracking, segregation of affected stock, and replacement or refund as appropriate. Our recall system emphasizes transparency, swift containment, and minimal disruption to the customer. All actions are documented and reported to relevant authorities if needed. Through timely and structured recall execution, SSMI-AD demonstrates its accountability and commitment to customer well-being, product integrity, and continuous improvement in risk management.

6.7 Chemical Exposure During Handling

Metallic dust or fumes may be generated when ingots are processed, cut, or heated. To prevent health risks such as respiratory irritation or skin exposure, SSMI-AD provides guidance on protective handling. This includes recommending suitable PPE and ventilation practices during machining or welding. These instructions are embedded in the SDS and training materials issued with products. Our communication strategy ensures that customers are equipped to make informed decisions about their workplace safety, thus reducing occupational health risks associated with alloy processing.

6.8 Product Degradation During Storage

Improper storage can degrade the quality and safety of non-ferrous alloys. SSMI-AD provides detailed guidance on ideal storage conditions including temperature, humidity, stacking methods, and protective coverings to prevent corrosion or oxidation. Customers are advised to avoid contact with moisture, acidic environments, or contaminants. Clear labeling and shelf-life information support proactive inventory management. This ensures product performance is maintained from dispatch to end-use, reducing operational disruptions and supporting safe, long-term material storage.

6.9 Non-compliance with BIS Safety Standards

All SSMI-AD products are developed and tested to meet or exceed BIS (Bureau of Indian Standards) safety norms applicable to each alloy category. We maintain internal checklists to ensure conformity with specifications such as IS 26:2024 for Tin or IS 209:2024 for Zinc. Regular internal and third-party audits validate this compliance. Any lapses are immediately rectified, and certifications are renewed in advance to avoid discontinuity. This commitment ensures product reliability, legal compliance, and customer confidence in the safety and legality of our offerings.

6.10 Lifecycle Pollution Impact

SSMI-AD integrates environmental considerations into the entire lifecycle of its products. From sourcing to end-of-life disposal, we adopt practices that minimize ecological harm. Customers are provided with end-of-life guidance for recycling or safe disposal of alloy waste. We participate in Extended Producer Responsibility (EPR) programs where applicable and collaborate with recyclers to recover usable metals.

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6.11 Adequate Incident Investigation

Every product-related safety complaint or incident reported by customers is treated with urgency. SSMI-AD conducts structured root cause analyses (RCA) using tools such as 5-Whys and Fishbone Diagrams. Findings are reviewed with relevant departments, and corrective and preventive actions (CAPA) are implemented to eliminate recurrence. Learnings are shared across teams to improve systems and design. This structured and transparent approach ensures accountability and continuous improvement in product safety, reinforcing customer trust and regulatory compliance.

6.12 Ergonomics for Handling by Customers

SSMI-AD considers customer safety during physical handling of ingots. We design products with ergonomic dimensions and manageable weights to reduce strain injuries. Labels indicating weight and lift points are included to guide safe stacking and movement. Where feasible, we provide recommendations on mechanical aids like forklifts or trolleys. By focusing on human factors engineering, SSMI-AD reduces the likelihood of musculoskeletal injuries among downstream users, aligning with our customer-centric and safety-first approach to product design and packaging.

6.13 Consistent Customer Safety Communication

SSMI-AD ensures that safety-related information is consistently delivered across all channels and formats. This includes providing multilingual Safety Data Sheets (SDS), product bulletins, and advisory notices through digital and physical mediums. Our documentation is designed to be easy to understand and accessible to a diverse customer base. Periodic reviews ensure alignment with new regulations and user feedback. Consistent communication reduces confusion, improves safe handling, and reinforces our brand as a reliable and responsible manufacturer.


6.14 Due to Product use

Some safety incidents stem from improper product use, such as incorrect alloy mixing, overheating, or inappropriate machining techniques. SSMI-AD tracks such patterns through customer feedback and market monitoring. We then update safety instructions, provide targeted guidance, or conduct awareness campaigns. Our aim is not only to protect customers from harm but also to help them use our products optimally. Reducing product misuse enhances both safety and performance, fostering long-term relationships with informed and capable customers.

6.15 Emerging Regulatory Non Compliance

SSMI-AD closely monitors changes in domestic and international regulations that may impact product safety, labeling, or environmental impact. A cross-functional team evaluates implications and updates product specifications, SDS, and testing protocols accordingly. This proactive regulatory surveillance ensures our products remain compliant and safe in all markets served. By staying ahead of evolving compliance requirements, we safeguard customer operations and promote responsible manufacturing practices aligned with ESG principles.

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7. ESG Objectives

- 1. Sustainability Issue : Contaminated Raw Materials**
Objective : Eliminate contaminants from incoming materials
Measure : % raw material batches tested
Target Value : ↑ 25%
- 2. Sustainability Issue : Adequate Testing for Product Integrity**
Objective : Strengthen product quality testing
Measure : % products passing integrity tests
Target Value : ↑ 45%
- 3. Sustainability Issue : Sufficient Product Information & Labeling**
Objective : Ensure accurate and clear labeling
Measure : % compliant product labels
Target Value : ↑ 70%
- 4. Sustainability Issue : Safe Packaging and Transport Practices**
Objective : Improve safety in packaging and logistics
Measure : % incidents during transport
Target Value : ↓ 90%
- 5. Sustainability Issue : Customer Advisory on Use Hazards**
Objective : Provide clear safety advisories to customers
Measure : % products with hazard advisory
Target Value : ↑ 100%
- 6. Sustainability Issue : Recall Unsafe Batches**
Objective : Strengthen recall mechanism
Measure : No. of mock recall drills conducted
Target Value : ↑ 1/year
- 7. Sustainability Issue : Chemical Exposure During Handling**
Objective : Reduce customer exposure to chemicals
Measure : % reduction in exposure-related complaints
Target Value : ↓ 100%

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| 8. Sustainability Issue
Objective
Measure
Target Value | : Product Degradation During Storage
: Improve product shelf-life integrity
: % products maintaining quality post-storage
: ↑ 95% |
| 9. Sustainability Issue
Objective
Measure
Target Value | : Non-compliance with BIS Safety Standards
: Ensure all products meet BIS standards
: % compliance rate with BIS
: ↑ 100% |
| 10. Sustainability Issue
Objective
Measure
Target Value | : Lifecycle Pollution Impact
: Minimize product environmental impact
: % products with lifecycle assessment completed
: ↑ 80% |
| 11. Sustainability Issue
Objective
Measure
Target Value | : Adequate Incident Investigation
: Enhance root cause analysis of incidents
: % incidents with investigation report
: ↑ 70% |
| 12. Sustainability Issue
Objective
Measure
Target Value | : Ergonomics for Handling by Customers
: Improve user-friendly product design
: % ergonomically assessed products
: ↑ 90% |
| 13. Sustainability Issue
Objective
Measure
Target Value | : Consistent Customer Safety Communication
: Standardize safety communication processes
: % customer communication reviewed quarterly
: ↑ 100% |
| 14. Sustainability Issue
Objective
Measure
Target Value | : Due to Product use
: Reduce misuse-related incidents
: % reduction in customer misuse incidents
: ↓ 25% |
| 15. Sustainability Issue
Objective
Measure
Target Value | : Emerging Regulatory Non Compliance
: Align with evolving regulations
: % compliance with updated standards
: ↑ 100% |

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8. Applicable Standards & Regulatory Frameworks

- ISO 14001 (environmental management),
- Aluminum Stewardship Initiative,
- UN Global Compact (principles on consumer responsibility),
- OECD Guidelines,
- GRI (especially GRI 416 on Customer Health & Safety),
- Carbon Disclosure Project (reporting on product stewardship).
- BIS Quality Control Orders (e.g. Aluminium & Aluminium Alloys Order, 2023)
- Bureau of Indian Standards Act, 2016 (Wikipedia)
- Occupational Safety,
- Health and Working Conditions Code 2020 (Wikipedia)

9. Distribution and Annual Review

SSMI-AD ensures transparent and broad communication of its Product Health and Safety Policy through employee handbooks, the intranet, and targeted training for staff involved in design, production, and customer service. External stakeholders receive safety information via product documentation, Safety Data Sheets (SDS), and packaging labels. Regular refresher trainings and updated materials maintain awareness and compliance. The Safety & Product Compliance Committee conducts an annual review of the policy, analyzing incidents, complaints, compliance data, regulatory changes, and stakeholder feedback. Recommended updates and corrective actions are submitted to the Board, reinforcing SSMI-AD's commitment to continuous improvement and robust product safety performance.

10. Disciplinary Action for Violators

SSMI-AD enforces a strict disciplinary framework to address non-compliance with product safety standards. Employees failing to adhere to established protocols may be subject to actions such as retraining, written warnings, temporary suspension, or even termination, depending on the severity of the violation. Persistent lapses in quality testing or mishandling of customer safety investigations are escalated to senior management for further review and possible disciplinary measures. This accountability mechanism ensures that all team members prioritize safety responsibilities. SSMI-AD believes that reinforcing compliance through fair yet firm action is vital for sustaining product integrity and protecting customer well-being.

11. Reporting Mechanism

SSMI-AD has established a transparent, accessible, and confidential mechanism for reporting product health and safety concerns. Customers, employees, and other stakeholders can report issues via a dedicated email nagaraj@sreesumangala.com, toll-free hotline, or the company's online portal. Each report is acknowledged within 48 hours, and an investigation is initiated without delay.

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Findings are evaluated by the Safety Committee, and appropriate corrective actions are taken. Where applicable, outcomes and preventive measures are communicated back to the reporting party. This system supports SSMI-AD's non-retaliation stance, encourages prompt reporting, and ensures resolution of safety issues in a timely and effective manner.

12. Conclusion

At SSMI-AD, product health and safety are fundamental to our mission and ESG commitments. We are dedicated to delivering non-ferrous alloy ingots and related products that are safe, compliant, and aligned with global industry standards. This policy reflects our unwavering responsibility to protect customers, workers, and downstream users from product-related harm. Through proactive risk management, employee training, and stakeholder engagement, we continuously improve safety performance and uphold our ethical obligations. Our commitment reinforces customer confidence, regulatory compliance, and the long-term sustainability of our business operations. SSMI-AD views product safety not just as a requirement, but as a core corporate value.

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26. Human Rights Protection Policy

SSMI-AD/ESG/POLICY-26

1. Purpose

SSMI-AD is committed to upholding human dignity and labor rights across its operations and supply chain. This policy aims to prevent, identify, and eradicate all forms of child labor, forced labor, bonded labor, and human trafficking in our business activities, in accordance with national and international standards.

2. Scope of Application

This policy applies to all employees, contractors, vendors, labor suppliers, and business partners engaged with SSMI-AD. It covers all operations related to the manufacturing of non-ferrous alloy ingots, including sourcing, procurement, logistics, and warehousing. The geographical scope includes all SSMI-AD facilities and supplier operations within India and any international locations involved in sourcing or business activities.

3. Governance

The policy is jointly owned by the ESG Officer and the Human Resource Head, ensuring integrated oversight of ethical labor practices. The ESG Governance Committee serves as the primary oversight body responsible for implementation and compliance monitoring. Regular updates and reports are submitted to the Board-level ESG Oversight Subcommittee for strategic review and alignment with global labor standards.

4. Definitions

✿ Child Labor

Child labor refers to the employment of individuals below the legal minimum working age, as defined by national laws or ILO standards. It includes work that deprives children of their childhood, interferes with their education, or exposes them to mental, physical, or moral harm in hazardous or exploitative environments.

✿ Forced Labor

Forced labor involves any work or service that individuals are compelled to perform against their will, under threat, coercion, or penalty. It violates basic human rights and may include withholding identity documents, threats of violence, or other manipulative tactics to suppress freedom and ensure compliance in the workplace.

✿ Debt Bondage

Debt bondage occurs when workers are forced to work to repay a loan or debt, often under unfair or exploitative terms. The debt is used as a means of control, and workers may be unable to leave the job or renegotiate terms, creating a cycle of entrapment and abuse.

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Human Trafficking

Human trafficking is the recruitment, transportation, or harboring of individuals through force, fraud, or coercion for the purpose of exploitation. This includes forced labor, sexual exploitation, or involuntary servitude. Victims are often misled or manipulated, and their freedoms severely restricted, making trafficking a grave human rights violation.

5. Roles and Responsibilities

HR Department

The HR Department is responsible for verifying the age of all employees during recruitment, ensuring employment contracts comply with labor laws, and managing grievance redressal related to labor practices. It plays a key role in implementing policies that prevent child labor and forced labor within the organization.

Procurement Team

The Procurement Team must conduct thorough due diligence of suppliers and contractors to ensure compliance with ethical labor standards. This includes vetting for risks of child labor, forced labor, or trafficking within the supply chain and integrating contractual obligations that uphold SSMI-AD's human rights and labor policy requirements.

Compliance Team

The Compliance Team monitors adherence to national and international labor laws, regularly audits internal processes, and flags non-compliance risks. It collaborates with HR and procurement to assess vulnerabilities in operations and supply chains and supports corrective action plans when violations of labor standards are identified or reported.

All Employees

All employees are expected to comply with SSMI-AD's labor and human rights policies, report any suspected violations through designated channels, and support a workplace culture that respects dignity and freedom. Every individual has a role in identifying, preventing, and escalating concerns regarding child labor, forced labor, or trafficking.

6. Human Rights Protection Policy

6.1 Due Diligence in Supply Chain

SSMI-AD recognizes that maintaining ethical standards requires robust due diligence across its entire supply chain. We conduct regular risk-based assessments, including on-site social audits, to verify suppliers' compliance with labor rights and human rights practices. Preference is given to vendors certified under globally recognized standards such as SA8000 or equivalent. Non-compliant suppliers are issued improvement notices and are expected to rectify violations within set timelines. If remediation is not achieved, relationships are reevaluated. Our supplier onboarding and evaluation processes are continually strengthened to prevent child labor, forced labor, and other abuses from infiltrating our value chain operations.

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6.2 Document Control Policy

SSMI-AD upholds every worker's right to control their personal identification documents. We have a strict policy that prohibits the retention of passports, identity cards, or other personal papers by employers or supervisors. To promote secure but voluntary safekeeping, we provide lockers and secure storage options for workers, particularly migrants. All HR and contractor staff are trained to comply with this policy. Violations are treated as serious breaches of human rights and are investigated promptly. This measure ensures freedom of movement and autonomy for all employees, safeguarding them from coercive or exploitative practices linked to document control.

6.3 Exploitation of Migrant Workers

Migrant workers are an essential part of the workforce, and SSMI-AD is committed to protecting their rights and ensuring equitable treatment. We oppose all forms of discrimination, abuse, or economic exploitation targeting migrant labor. The company only partners with recruitment agencies that are licensed and certified to follow ethical labor practices. Workers must not be subjected to wage withholding, excessive recruitment fees, or deceptive employment contracts. SSMI-AD ensures that migrant employees have full access to grievance mechanisms, understand their rights, and receive equal pay for equal work. Our policies are aligned with international labor standards for migrant worker protection.

6.4 Exploitation Victim Assistance

When SSMI-AD identifies victims of child labor, forced labor, or human trafficking, we implement a transparent and supportive remediation process. The process includes immediate safety assurance, access to healthcare and counseling, and long-term reintegration planning. Victims are engaged throughout the process to ensure respectful and appropriate support. We also coordinate with NGOs, government agencies, and legal authorities where necessary to provide holistic aid. Our goal is not only to stop the abuse but also to empower affected individuals to recover and thrive. The remediation procedure reflects our zero-tolerance approach and dedication to human rights restoration.

6.5 Ethical Stakeholder Engagement

SSMI-AD recognizes the importance of involving external stakeholders, including NGOs, community organizations, and affected worker groups, in addressing labor rights issues. We conduct structured consultations to gather insights, validate risk perceptions, and identify areas for corrective actions. This inclusive approach strengthens our due diligence process and fosters trust and transparency. Input from these consultations directly influences our strategies, policies, and partnerships aimed at preventing child labor, forced labor, and trafficking. By collaborating with credible civil society actors, we ensure that our approach remains responsive to real-world risks and respects the voices of those most affected.

6.6 Human Trafficking Risks

SSMI-AD actively works to identify, prevent, and eliminate any risk of human trafficking within its operations and supply chain. We recognize that trafficking can occur in complex supply chains, particularly through unregulated labor recruitment or outsourcing. Therefore, we implement strict due diligence and screening procedures when engaging with vendors and contractors.

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Our employees, suppliers, and partners receive regular training on how to detect and report signs of trafficking. SSMI-AD also provides safe, confidential channels for whistleblowers to report suspected trafficking incidents. Our goal is to create an environment where all individuals are safe from coercion, exploitation, and abuse.

6.7 Minor Worker Safety

Where SSMI-AD employs young workers (aged 15–17), we implement special protections to ensure their health, safety, and overall development. Young workers are assigned only non-hazardous tasks and are not subjected to night shifts or overtime. Regular medical check-ups, mentorship, and workplace supervision are integral parts of our youth employment protocol. Work schedules are designed to allow adequate time for rest, education, and social well-being. These measures are aligned with international best practices and national laws and reflect SSMI-AD's commitment to the ethical engagement and long-term welfare of young workers in the formal economy.

6.8 Ethical Labor Training

SSMI-AD delivers mandatory training programs to employees, management, and HR personnel on human rights issues, including child labor, forced labor, and human trafficking. These sessions aim to raise awareness, build early detection skills, and promote ethical decision-making. Training content is aligned with international conventions and is regularly updated to reflect new developments and compliance requirements. We emphasize interactive learning and real-life case scenarios to make sessions practical and impactful. Through regular training, SSMI-AD empowers its workforce to uphold human rights, identify signs of abuse, and take prompt action against potential violations.

6.9 Forced Labor and Bonded Labor

SSMI-AD is committed to eradicating all forms of forced labor and bonded labor from its operations and business relationships. This includes employment practices involving coercion, debt bondage, withholding of wages, retention of personal identification, or threats of punishment. Employment with SSMI-AD and its partners must be entered into freely, with all workers having the right to terminate their employment with reasonable notice. The company ensures transparency in labor contracts and monitors compliance through regular internal reviews and third-party assessments. Forced labor is a severe violation of human rights, and any association with such practices will lead to strict corrective action.

6.10 Exploitation Risk Analysis

SSMI-AD regularly conducts Human Rights Impact Assessments (HRIAs) to identify and assess potential and actual risks related to child labor, forced labor, and human trafficking within our operations and supply chain. These assessments are grounded in international frameworks and consider the severity, scope, and irreversibility of human rights violations. We engage with stakeholders, especially vulnerable groups like migrant and contract workers, to ensure that risks are captured accurately. The insights from HRIAs inform our risk mitigation strategies, operational improvements, and continuous alignment with legal and ethical labor standards.

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6.11 Grievance Mechanisms for Vulnerable Workers

SSMI-AD is committed to ensuring that all employees, especially vulnerable groups such as contract workers, women, migrants, and youth, have unrestricted access to safe and confidential grievance mechanisms. These mechanisms are designed to receive, investigate, and resolve complaints in a timely and respectful manner without any fear of retaliation. We actively promote awareness of these mechanisms during onboarding, training sessions, and through regular workplace communication. By providing a reliable avenue for workers to voice concerns, SSMI-AD fosters a transparent and supportive workplace culture, encouraging early identification of risks and strengthening employee trust in the organization's ethical commitment.

6.12 Ethical Compliance Monitoring

SSMI-AD employs a structured system of internal controls to monitor compliance with human rights policies and evaluate the effectiveness of interventions. Internal audits, periodic management reviews, and corrective action tracking are part of our governance mechanism. These tools help identify gaps, assess outcomes, and update practices in a timely manner. We also involve relevant departments in reviewing control measures to ensure alignment with operational realities. Through continuous improvement and accountability checks, SSMI-AD ensures that its commitment to human rights is not only documented but embedded in daily operations and management systems across the value chain.

6.13 Youth Labor Prevention

SSMI-AD strictly enforces age verification procedures during recruitment to ensure compliance with Indian labor laws and ILO conventions. All candidates must submit authentic proof of age before being considered for employment. The HR department verifies these documents as part of the pre-employment screening process. Recruitment partners are also required to follow age verification protocols to prevent accidental or deliberate hiring of underage workers. This practice protects children from exploitative labor and ensures that our operations remain legally compliant and ethically sound. We prioritize education and safety over employment for minors under the legal working age.

6.14 Child Labor in Operations or Supply Chain

SSMI-AD maintains a zero-tolerance approach toward child labor across all areas of operation, including its extended supply chain. We ensure that every employee's age is legally verified before employment, adhering to both national laws and International Labour Organization (ILO) standards. Suppliers and contractors are contractually obligated to comply with minimum age requirements. Children must not be subjected to hazardous or exploitative work, nor should their education be compromised. Regular audits, site inspections, and vendor compliance reviews are carried out to ensure that no child labor is involved directly or indirectly in the production or delivery of our goods and services.

6.15 Worker Rights Reporting

SSMI-AD has established a robust, anonymous grievance mechanism accessible to all workers and stakeholders to report concerns related to child labor, forced labor, or human trafficking. The platform supports multiple languages and can be accessed through digital or in-person channels. Complaints are handled confidentially, without fear of retaliation, and tracked through a structured resolution process.

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Every grievance is investigated thoroughly and impartially. Feedback mechanisms ensure that complainants are informed about outcomes. This system reinforces SSMI-AD's values of transparency, accountability, and justice, while providing an essential safeguard for the rights and dignity of vulnerable groups.


6.16 Movement Freedom Protection

SSMI-AD mandates that all security personnel operate in accordance with human rights principles, including respect for personal freedom and non-violence. Security guards receive training on the appropriate use of force, conflict de-escalation techniques, and the importance of protecting the rights of all individuals on our premises. We follow UN guidelines and local laws to ensure dignity and safety for everyone. Incidents involving abuse or excessive control are subject to investigation and disciplinary action. SSMI-AD's security practices are designed to create a safe, respectful workplace while preventing any form of intimidation, abuse, or restriction of movement.

7. ESG Objectives

- Sustainability Issue** : **Due Diligence in Supply Chain**
Objective : Strengthen supplier screening for labor violations
Measure : % suppliers assessed for labor risks
Target Value : ↑ 100%
- Sustainability Issue** : **Document Control Policy**
Objective : Enforce identity and age documentation standards
Measure : % employees with verified documents
Target Value : ↑ 80%
- Sustainability Issue** : **Exploitation of Migrant Workers**
Objective : Protect rights of migrant workers
Measure : % migrant workers under ethical contracts
Target Value : ↑ 80%
- Sustainability Issue** : **Exploitation Victim Assistance**
Objective : Provide support for exploitation victims
Measure : No. of victim support programs
Target Value : ↑ 2
- Sustainability Issue** : **Ethical Stakeholder Engagement**
Objective : Involve stakeholders in labor rights dialogue
Measure : No. of stakeholder consultations
Target Value : ↑ 2


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| <p>6. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Human Trafficking Risks</p> <p>: Identify and eliminate trafficking indicators</p> <p>: % operations assessed for trafficking risks</p> <p>: ↑ 100%</p> |
| <p>7. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Minor Worker Safety</p> <p>: Ensure legal and safe work conditions for young workers</p> <p>: % compliance with youth labor laws</p> <p>: ↑ 90%</p> |
| <p>8. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Ethical Labor Training</p> <p>: Build awareness on ethical labor practices</p> <p>: % employees trained on labor rights</p> <p>: ↑ 70%</p> |
| <p>9. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Forced Labor and Bonded Labor</p> <p>: Eliminate coercion and debt bondage</p> <p>: % workforce under voluntary contracts</p> <p>: ↑ 65%</p> |
| <p>10. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Exploitation Risk Analysis</p> <p>: Proactively analyze and mitigate risks</p> <p>: No. of risk assessments conducted</p> <p>: ↑ 1/year</p> |
| <p>11. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Grievance Mechanisms for Vulnerable Workers</p> <p>: Ensure accessible reporting channels</p> <p>: % workforce aware of grievance mechanism</p> <p>: ↑ 80%</p> |
| <p>12. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Ethical Compliance Monitoring</p> <p>: Monitor labor ethics compliance regularly</p> <p>: % suppliers audited for labor practices</p> <p>: ↑ 80%</p> |
| <p>13. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Youth Labor Prevention</p> <p>: Prevent underage employment</p> <p>: % compliance with minimum age laws</p> <p>: ↑ 100%</p> |

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14.Sustainability Issue : Child Labor in Operations or Supply Chain

Objective : Eliminate child labor from all tiers
Measure : No. of child labor cases
Target Value : ↓ 0

15.Sustainability Issue : Worker Rights Reporting

Objective : Promote transparent worker rights communication
Measure : No. of labor rights reports published
Target Value : ↑ 2

16.Sustainability Issue : Movement Freedom Protection

Objective : Ensure unrestricted worker mobility
Measure : % employees with unrestricted movement
Target Value : ↑ 100%

8. Applicable Laws, Acts, and Standards

- The Child Labour (Prohibition and Regulation) Act, 1986 (India)
- The Bonded Labour System (Abolition) Act, 1976
- Indian Penal Code (Sections on trafficking and slavery)
- ILO Convention No. 182 and 138
- UN Global Compact (Principle 4 & 5)
- OECD Guidelines for Multinational Enterprises
- SA8000 Standard
- Aluminum Stewardship Initiative
- UN Guiding Principles on Business and Human Rights
- Global Reporting Initiative (GRI 408 & 409)

9. Distribution and Annual Review

SSMI-AD ensures broad dissemination of its Child and Forced Labor Policy to promote awareness and accountability among all stakeholders. The policy is accessible via the internal HR portal and official website and is shared with new hires, contractors, vendors, and labor suppliers during onboarding or registration. It is emphasized during orientation and supplier evaluations, and embedded in contracts and induction materials to reinforce SSMI-AD's zero-tolerance stance. Reviewed annually by the ESG Governance Committee, the policy is updated based on legal changes, ILO standards, industry best practices, and stakeholder input. Updates are communicated through briefings and re-issuance to ensure continued compliance and effectiveness.

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10. Disciplinary Action for Violators

SSMI-AD takes any breach of this policy with the utmost seriousness. Upon receiving a report of potential violation, an immediate and confidential investigation is launched by the Compliance and HR teams. If the violation is confirmed, disciplinary actions may include employee suspension, termination, legal reporting to authorities, or cancellation of supplier contracts. For business partners, failure to comply with the child and forced labor provisions may result in blacklisting or delisting from approved vendors. SSMI-AD maintains a zero-tolerance policy and is committed to enforcing it strictly to preserve the ethical integrity of its operations and to protect affected individuals.

11. Reporting Mechanism

SSMI-AD has established multiple robust and confidential channels to report violations of this policy. An anonymous grievance portal is available to all workers to report child labor, forced labor, or trafficking-related concerns without fear of retaliation. Ethical complaints may also be sent to a dedicated ESG email helpline, which is monitored regularly by the compliance team. Additionally, the organization engages external third-party auditors to conduct periodic audits, interviews, and workplace assessments. A whistleblower protection program is in place to safeguard individuals who raise genuine concerns. These mechanisms ensure transparency, early detection, and swift resolution of any unethical labor practices.

12. Conclusion

SSMI-AD reaffirms its unwavering commitment to uphold fundamental human rights and eliminate all forms of child labor, forced labor, bonded labor, and human trafficking within its operations and supply chain. As part of our ESG integration journey, we continually assess risk areas, strengthen due diligence procedures, and collaborate with stakeholders for systemic improvements. We strive to meet and exceed compliance with national laws and international frameworks, including ILO conventions and UN Guiding Principles on Business and Human Rights. By fostering transparency, accountability, and ethical conduct, SSMI-AD aims to contribute meaningfully to a just and dignified work environment for all individuals.

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27. Fair Treatment Policy

SSMI-AD/ESG/POLICY-27

1. Purpose

This policy ensures fair and equitable treatment for all employees and stakeholders by strictly prohibiting discrimination based on gender, race, caste, religion, sexual orientation, gender identity, age, disability, or any other protected characteristic. It promotes diversity, fosters an inclusive workplace, supports talent retention, and reinforces SSMI-AD's commitment to ethical governance and ESG principles.

2. Scope of Application

This policy applies to all SSMI-AD employees, including permanent, contractual, interns, job applicants, vendors, trainees, and third-party associates. It covers all business functions such as recruitment, promotions, remuneration, training, benefits, and workplace conduct. The policy is enforceable across all SSMI-AD operations in India and international locations where we operate.

3. Governance

The Board of Directors and ESG Committee provide policy oversight. The HR Department and Diversity Council are responsible for implementation, addressing complaints, and monitoring diversity metrics. Managers play a critical role in ensuring daily compliance, promoting inclusive practices, and fostering a respectful work environment within their teams.

4. Definitions

✿ Discrimination

Discrimination refers to unfair or unequal treatment of an individual or group based on protected characteristics such as gender, caste, religion, or disability. It includes biased decisions in hiring, promotions, compensation, or workplace access that negatively impact affected individuals and contradict the organization's values of fairness, equity, and inclusion.

✿ Harassment

Harassment involves unwelcome, offensive, or intimidating behavior that creates a hostile, degrading, or humiliating work environment. It may be verbal, physical, or visual and includes actions that demean or threaten an individual due to their protected characteristics. Harassment undermines employee wellbeing, violates dignity, and disrupts organizational harmony.

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✿ Protected Characteristics

Protected characteristics are personal attributes safeguarded against discrimination and harassment. These include, but are not limited to, gender identity, age, caste, religion, race, sexual orientation, and physical or mental disability. Respecting these characteristics ensures equal opportunity and fosters a diverse, inclusive, and respectful workplace environment.

5. Roles & Responsibilities

✿ Employees

Employees are expected to uphold the values of respect, fairness, and inclusivity in all workplace interactions. They should participate in relevant training, speak out against discriminatory behavior, and promptly report any observed or experienced incidents of discrimination or harassment using the organization's designated reporting mechanisms without fear of retaliation.

✿ Managers

Managers play a key role in implementing and upholding the anti-discrimination policy. They are responsible for making equitable decisions in hiring, promotions, and task assignments, addressing complaints sensitively, and setting a clear example of inclusive leadership. They must foster a respectful culture and escalate any reported concerns to HR immediately.

✿ HR

The Human Resources department is responsible for managing the organization's discrimination and harassment prevention efforts. This includes conducting regular workplace audits, coordinating role-specific training programs, maintaining an effective reporting and grievance redressal system, and ensuring timely and fair investigation of complaints in alignment with legal standards and internal policies.

✿ ESG Committee

The ESG Committee provides oversight on policy effectiveness, monitors key inclusion indicators, and reviews trends in complaints and resolutions. It collaborates with HR and leadership to identify systemic issues and recommend strategic improvements. The Committee ensures alignment of anti-discrimination efforts with the company's ESG objectives and reports outcomes to the Board.

6. Fair Treatment Policy

6.1 Caste or Religious Bias

At SSMI-AD, we uphold the constitutional values of secularism and equality by ensuring a caste-free and religion-neutral work environment. We reject any form of bias or preferential treatment in hiring, promotions, compensation, or daily interactions. Employment decisions are based solely on merit, performance, and potential.

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Any act of caste or religious discrimination, exclusion, or microaggression is treated as a serious violation of our policy. SSMI-AD embraces cultural diversity while maintaining a neutral stance on religion and caste within the workplace. Through equitable processes and awareness programs, we aim to create a bias-free and inclusive corporate culture.

6.2 Retaliation Against Complainants

SSMI-AD enforces a zero-tolerance policy on retaliation. Any employee, stakeholder, or third-party who raises a concern or complaint regarding discrimination or harassment is protected under this policy. Retaliatory actions such as demotion, exclusion, intimidation, or threats are not tolerated and will be subject to disciplinary measures. We maintain strict confidentiality and safeguard whistleblowers from repercussions. All employees are encouraged to report unethical conduct without fear. Protecting those who speak up reinforces our commitment to justice, transparency, and ethical governance. SSMI-AD values integrity and ensures that the reporting process is safe, supportive, and respected.

6.3 Pandemic Bias Incidents

SSMI-AD is committed to protecting employees' rights during public health emergencies. We prohibit any form of discrimination based on COVID-19 status or other health conditions. Employees who are recovering or have caregiving responsibilities are provided accommodations where feasible. Privacy and dignity are respected, and health information is kept confidential. Decisions regarding attendance, promotions, or assignments are not based on medical status. Our goal is to support a compassionate and responsible response to health crises, ensuring that no employee is unfairly penalized due to illness or caregiving needs.

6.4 Career Advancement Bias

SSMI-AD is committed to fostering a workplace where every employee has an equal opportunity to grow and succeed. We ensure that training, development, and promotion pathways are accessible to all, without bias based on gender, caste, religion, age, or disability. Decisions related to career advancement are made based on performance, capability, and future potential. Supervisors and HR personnel are regularly trained to uphold equity in these processes. SSMI-AD proactively identifies and addresses any disparities in development access or promotional outcomes, ensuring that merit remains the sole basis for growth while upholding inclusivity in leadership pipelines.

6.5 Religious Practice Bias

Employees at SSMI-AD have the right to express their cultural, ethnic, or religious identity through dress and observances, provided it aligns with safety and operational standards. Discrimination or mockery related to religious attire, dietary practices, or rituals is strictly prohibited. We support flexible arrangements during religious festivals and prayer needs where operationally feasible. Managers are trained to be sensitive to diverse customs and practices. SSMI-AD respects personal identity and spiritual expression as a part of our broader commitment to human rights, diversity, and workplace dignity.

6.6 Hiring Bias in Recruitment Process

SSMI-AD is committed to fair and unbiased recruitment practices. All hiring processes are designed to be structured, transparent, and inclusive. We use standard criteria, diverse interview panels, and anonymized resumes where appropriate to reduce unconscious bias.

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Selection decisions are based solely on skills, qualifications, and cultural fit. Recruitment teams are trained on inclusive hiring and the importance of equal opportunity. Any deviation from fair practices is investigated and rectified. Our recruitment principles align with our ESG values, ensuring that SSMI-AD attracts and retains talent from all backgrounds in an equitable manner.

6.7 Equal Access to Benefits

SSMI-AD ensures that all benefits, including health insurance, leave entitlements, wellness programs, and perks, are distributed equitably across employee groups. This includes ensuring that same-sex partners and marginalized group members receive the same level of access and support as others. We audit benefit usage and communicate entitlements clearly to avoid gaps or confusion. No employee should face exclusion from any benefit due to their background, relationship status, or demographic identity. Our inclusive benefits policy reflects our commitment to fairness, wellbeing, and ESG principles of social equity and dignity.

6.8 Fair Talent Selection

SSMI-AD is dedicated to maintaining a recruitment process that is inclusive, fair, and free from discrimination. We ensure that all job postings, interview questions, and candidate assessments are designed to promote equal opportunity regardless of gender, caste, religion, age, disability, or sexual orientation. Hiring panels are structured to reflect diversity and are trained to identify and avoid bias. We implement safeguards such as anonymized applications and inclusive language in job descriptions. SSMI-AD regularly reviews hiring practices to uphold fairness, foster workplace diversity, and align with its ESG commitments to ethical labor practices.

6.9 Language-related Discrimination

SSMI-AD supports linguistic diversity and prohibits discrimination based on language proficiency, accent, or mother tongue. We ensure that communication, training materials, and key policies are available in multiple languages to enhance understanding and inclusivity. Employees are encouraged to express themselves in a language they are comfortable with, as long as it maintains workplace decorum. Disparaging remarks, mockery, or exclusion based on language or accent will not be tolerated. We recognize that language inclusivity strengthens communication, reduces isolation, and enhances productivity across culturally diverse teams.

6.10 Representation of Minorities

SSMI-AD acknowledges that certain demographic groups may be underrepresented in management and technical roles. To address this, we set internal goals for inclusive hiring and talent development. Recruitment outreach is expanded to reach diverse communities, and mentoring programs support career advancement of minorities. Inclusive leadership is promoted through awareness, training, and accountability measures. We periodically assess representation across levels and functions to track progress. We aim to create an environment where diverse perspectives are represented in decision-making roles, strengthening innovation, engagement, and equity across the organization.

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6.11 Cultural Insensitivity or Bias

SSMI-AD encourages a respectful and culturally aware workplace where diverse customs, traditions, and perspectives are valued. We do not tolerate jokes, language, or behavior that undermines or ridicules any culture. Employees undergo cultural competence training to build awareness and empathy. We promote inclusive communication and celebrate diverse festivals and observances in a respectful manner. Any instance of cultural insensitivity is treated seriously and addressed through appropriate action. Embracing cultural diversity fosters belonging, collaboration, and innovation. At SSMI-AD, we believe cultural respect is essential to a harmonious and high-performing workforce.

6.12 Bias in Performance Evaluation

SSMI-AD is committed to ensuring that performance evaluations are fair, transparent, and free from personal biases. Appraisals are based on measurable outcomes, behavioral indicators, and objective feedback mechanisms. Managers are trained to avoid unconscious bias and conduct evaluations consistently across all teams. To further ensure equity, calibration sessions and cross-departmental reviews are held. Any patterns of bias, favoritism, or unfair assessment are investigated and addressed. A fair appraisal system supports employee morale, encourages growth, and aligns with our ESG objectives of equal opportunity and ethical workplace practices.

6.13 Equal Training Opportunities

At SSMI-AD, we believe that learning and growth are fundamental rights of every employee. All individuals, regardless of background, position, or tenure, are provided equitable access to training and development programs. We actively identify gaps in participation to ensure inclusivity in skill-building initiatives. Training calendars and opportunities are communicated transparently, and criteria for enrollment are clearly defined. Managers are encouraged to nominate employees from underrepresented groups and monitor participation. By fostering equal access to learning, we empower our workforce, strengthen our leadership pipeline, and uphold our ESG commitment to career development and equity.

6.14 Ageism in Hiring or Promotion

SSMI-AD values experience and potential in equal measure. We do not allow age to be a limiting factor in recruitment, promotion, or training decisions. We encourage a multigenerational workforce and aim to harness the unique strengths of individuals across all age groups. Age-related stereotypes or assumptions in decision-making are actively discouraged. Whether fresh graduates or seasoned professionals, all candidates are considered for opportunities based on skills, competence, and alignment with organizational goals. Fairness, respect, and equal opportunity are essential to ensuring a workplace where age diversity is embraced, not penalized.

6.15 Ability Discrimination

SSMI-AD provides an accessible and accommodating environment for persons with disabilities. We are committed to making reasonable adjustments to support the inclusion of employees with physical, sensory, cognitive, or mental health conditions. This includes accessible infrastructure, assistive technologies, flexible work arrangements, and a supportive organizational culture. Discrimination, isolation, or undue hardship based on disability is strictly prohibited. We recognize the valuable contributions of persons with disabilities and strive to ensure full participation in all aspects of work life. Our approach aligns with ESG principles, ensuring human dignity and inclusiveness for all employees.

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6.16 Sexual Orientation Discrimination

SSMI-AD promotes an inclusive environment where individuals of all sexual orientations and gender identities feel safe, respected, and empowered. We explicitly prohibit discrimination, bias, or exclusion based on sexual orientation or gender identity. Our workplace policies ensure that LGBTQ+ employees have equitable access to all benefits, career opportunities, and protections available to others. We actively foster inclusion through awareness training, allyship programs, and equitable benefits coverage. We believe that embracing diverse identities contributes to employee wellbeing and enhances organizational performance. Every person, regardless of orientation, is encouraged to bring their authentic self to work.


6.17 Gender-based Wage Gap

SSMI-AD is committed to equal pay for equal work regardless of gender. We recognize that gender-based wage disparities are a systemic issue and commit to proactive audits and transparent pay structures. By periodically analyzing compensation data, SSMI-AD ensures that any unjustified discrepancies are identified and addressed. Where wage gaps are found to exceed acceptable thresholds, we initiate corrective actions, including salary adjustments and managerial accountability. Our policies promote a gender-neutral compensation framework, supporting a fair and inclusive work environment. Pay equity is a cornerstone of our ESG strategy and essential to our reputation as an equitable employer.

7. ESG Objectives

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| 1. Sustainability Issue | : Caste or Religious Bias |
| Objective | : Eliminate caste and religion-based discrimination |
| Measure | : % workforce trained on anti-discrimination |
| Target Value | : ↑ 65% |
| 2. Sustainability Issue | : Retaliation Against Complainants |
| Objective | : Protect employees who report discrimination |
| Measure | : % of cases with non-retaliation assurance |
| Target Value | : ↑ 60% |
| 3. Sustainability Issue | : Pandemic Bias Incidents |
| Objective | : Prevent bias during health crises |
| Measure | : No. of pandemic-related bias cases |
| Target Value | : ↓ 0 |
| 4. Sustainability Issue | : Career Advancement Bias |
| Objective | : Ensure equal promotion opportunities |
| Measure | : % promotions based on merit |
| Target Value | : ↑ 100% |


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| <p>5. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Religious Practice Bias</p> <p>: Respect religious observances</p> <p>: % accommodation requests honored</p> <p>: ↑ 100%</p> |
| <p>6. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Hiring Bias in Recruitment Process</p> <p>: Promote bias-free recruitment</p> <p>: % diverse candidates in shortlists</p> <p>: ↑ 50%</p> |
| <p>7. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Equal Access to Benefits</p> <p>: Ensure benefit equality across all groups</p> <p>: % parity in access to benefits</p> <p>: ↑ 90%</p> |
| <p>8. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Fair Talent Selection</p> <p>: Base selections on transparent criteria</p> <p>: % selections reviewed for fairness</p> <p>: ↑ 75%</p> |
| <p>9. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Language-related Discrimination</p> <p>: Prevent exclusion due to language</p> <p>: % multilingual communication materials</p> <p>: ↑ 80%</p> |
| <p>10. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Representation of Minorities</p> <p>: Increase workforce diversity</p> <p>: % minority representation</p> <p>: ↑ 15%</p> |
| <p>11. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Cultural Insensitivity or Bias</p> <p>: Build inclusive cultural awareness</p> <p>: % employees trained in cultural sensitivity</p> <p>: ↑ 90%</p> |
| <p>12. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Bias in Performance Evaluation</p> <p>: Standardize unbiased evaluation tools</p> <p>: % evaluations using objective metrics</p> <p>: ↑ 80%</p> |

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13.Sustainability Issue

: Equal Training Opportunities

Objective

: Ensure equal access to upskilling

Measure

: % training participation by gender and minority

Target Value

: ↑ 70%

14.Sustainability Issue

: Ageism in Hiring or Promotion

Objective

: Prevent age-based discrimination

Measure

: % hires/promotions across age groups

Target Value

: ↑ 100%

15.Sustainability Issue

: Ability Discrimination

Objective

: Promote disability inclusion

Measure

: % facilities with accessibility features

Target Value

: ↑ 100%

16.Sustainability Issue

: Sexual Orientation Discrimination

Objective

: Foster LGBTQ+ inclusion

Measure

: % workforce trained on inclusivity

Target Value

: ↑ 60%

17.Sustainability Issue

: Gender-based Wage Gap

Objective

: Ensure equal pay for equal work

Measure

: % gender pay parity achieved

Target Value

: ↑ 75%

8. Applicable Standards & Laws

- SA8000, UN Global Compact Principle 6,
- OECD Guidelines,
- ILO conventions, GRI 406.
- Constitution (Articles 14–18),
- POSH Act 2013, Equal Remuneration Act,
- Persons with Disabilities Act.

9. Distribution and Annual Review

SSMI-AD ensures widespread awareness of its anti-discrimination and harassment policy through a multi-channel approach, including onboarding, annual refresher training, intranet access, visible workplace displays, and accessible formats in local languages. This ensures all employees understand their rights, responsibilities, and support mechanisms.

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The HR department, in partnership with the ESG Committee, evaluates the policy's effectiveness annually and after major incidents. The review considers audits, incident data, employee feedback, and legal changes. Gaps and improvement areas are addressed through training or policy updates. Findings are documented and escalated to the Board when needed, maintaining a respectful, inclusive, and compliant workplace.

10. Disciplinary Action for Violators

SSMI-AD enforces a zero-tolerance approach toward discrimination and harassment. Confirmed violations may result in disciplinary actions ranging from counseling and formal reprimands to suspension, demotion, or termination, depending on the severity and recurrence of the offense. Managers and supervisors who fail to act on reported concerns or who demonstrate bias in enforcement may also face disciplinary consequences. To foster improvement and behavioral change, re-training opportunities may be provided for minor infractions. This structured disciplinary framework ensures accountability, fairness, and the reinforcement of organizational values around respect, equity, and inclusive conduct.

11. Reporting Mechanism

SSMI-AD provides multiple, confidential channels for reporting incidents of discrimination or harassment. Stakeholders can report concerns to HR, through an anonymous hotline, via a secure email system, or directly to the Ethics Committee. All reports are treated with the utmost confidentiality, and the company strictly enforces a non-retaliation policy to protect those who come forward. Complainants receive acknowledgment of their report within 48 hours, and a formal investigation is initiated within 7 days. Throughout the process, SSMI-AD offers support services to impacted individuals, ensuring transparency, fairness, and resolution in accordance with organizational and legal standards.

12. Conclusion

SSMI-AD is deeply committed to building and sustaining a workplace rooted in diversity, equity, and respect. This anti-discrimination and harassment policy is a key pillar of our ESG strategy and underscores our belief that every individual deserves to work in an environment free from bias and hostility. By upholding this policy, we promote dignity, empower voices, and create pathways for all employees to thrive. Our proactive approach reflects our values and enhances the company's social and ethical integrity. SSMI-AD encourages ongoing dialogue, continuous learning, and collective responsibility in driving an inclusive organizational culture forward.

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28. Energy Usage Policy

SSMI-AD/ESG/POLICY-28

1. Purpose

To optimize energy use, reduce greenhouse gas (GHG) emissions, and improve energy efficiency across all operations, in line with our commitment to sustainable development, competitiveness, and compliance with ESG frameworks and industry-specific best practices.

2. Scope of Application

This policy applies to all employees, energy managers, operations staff, and contractors engaged in SSMI-AD's operations. It covers all business areas including manufacturing, smelting, refining, melting, recycling, material handling, transport, and administrative functions. Geographically, the policy extends to all SSMI-AD facilities, branches, and operational zones across India.

3. Governance

Energy management at SSMI-AD is overseen by the ESG Energy Oversight Committee led by the Sustainability Head. The committee conducts regular energy audits and performance reviews. Monthly ESG monitoring ensures alignment with targets, and energy and GHG performance metrics are reported quarterly to the Board for strategic oversight.

4. Definitions

☀ Scope 1 Emissions

Scope 1 emissions refer to direct greenhouse gas emissions from sources owned or controlled by SSMI-AD, such as fuel combustion in furnaces, diesel generators, and process equipment. These emissions are measured and reported as part of the company's efforts to reduce its direct environmental impact.

☀ Scope 2 Emissions

Scope 2 emissions are indirect greenhouse gas emissions resulting from the generation of purchased electricity, steam, heating, and cooling consumed by SSMI-AD. Though these emissions occur at external facilities, they are a significant part of our carbon footprint and are monitored to improve energy sourcing and efficiency.

☀ GHG (Greenhouse Gases)

Greenhouse gases (GHGs) include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These gases trap heat in the atmosphere and contribute to climate change. SSMI-AD tracks and reports GHG emissions in line with international standards like the GHG Protocol.

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* Energy Intensity

Energy intensity measures the amount of energy consumed per unit of production output. At SSMI-AD, this metric helps assess energy efficiency across operations. Reducing energy intensity through process optimization, equipment upgrades, and best practices is a key ESG objective aligned with cost reduction and sustainability goals.

5. Roles and Responsibilities

* Top Management

Top Management at SSMI-AD is responsible for approving energy efficiency targets, allocating necessary financial and human resources, and embedding energy performance into corporate strategy. Their leadership ensures that energy conservation is prioritized and integrated across all levels of operations to support long-term ESG and sustainability goals.

* ESG Committee

The ESG Committee monitors the implementation of energy management initiatives, reviews performance data, ensures compliance with relevant standards, and reports progress to senior leadership. It facilitates coordination between departments, addresses energy-related risks and opportunities, and promotes accountability in achieving the company's energy and emissions reduction commitments.

* Operations Head

The Operations Head oversees the execution of energy conservation measures across production, logistics, and support services. This includes integrating best practices into operational processes, ensuring adherence to energy management plans, training teams on efficient practices, and evaluating the performance of energy-saving initiatives to improve overall energy use efficiency.

* Facility Managers

Facility Managers are tasked with monitoring real-time energy consumption, identifying inefficiencies, and implementing improvements at the site level. They maintain energy data logs, coordinate equipment upgrades, and lead on-the-ground actions such as preventive maintenance, sensor installation, and lighting retrofits to meet SSMI-AD's energy reduction targets.

* Employees

Employees play a vital role in daily energy conservation by following energy-efficient practices, such as switching off unused equipment, minimizing idle times, and reporting leaks or energy wastage. Their active participation supports a culture of sustainability and helps identify continuous improvement opportunities within the workplace.

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6. Energy Usage Policy

6.1 Efficient Heat Recovery and Gas Capture

Recognizing the opportunity to recover lost energy and reduce emissions, SSMI-AD will invest in advanced heat recovery systems and gas capture technologies across its manufacturing lines. These systems will harness residual heat from furnaces and exhaust gases to reduce energy demand for auxiliary processes. Recovered heat may also be reused for preheating raw materials or facility heating, enhancing overall energy efficiency. Additionally, gas capture technologies will minimize harmful process emissions and improve air quality. These innovations demonstrate SSMI-AD's commitment to energy conservation, cost reduction, and responsible manufacturing, while also meeting the company's sustainability targets and environmental compliance obligations.

6.2 Recovered Heat Utilization

SSMI-AD will implement Waste Heat Recovery Systems (WHRS) and explore Combined Heat and Power (CHP) technologies to utilize excess thermal energy generated during smelting and melting operations. These systems improve overall energy efficiency, reduce primary fuel consumption, and lower operational costs. WHRS will capture heat from exhausts or furnace flues and repurpose it for preheating or process heating, minimizing energy wastage. CHP units will be evaluated where continuous heat and power loads exist. These technologies reflect SSMI-AD's commitment to circular energy flows and industrial decarbonization. Their deployment will be phased based on site suitability, economic feasibility, and technological readiness.

6.3 Carbon Emissions from High-Carbon Raw Inputs

SSMI-AD is committed to reducing emissions associated with the use of high-carbon raw materials such as certain ores and untreated scrap. The company will implement carbon screening protocols to assess the carbon intensity of all inbound materials. When high-carbon inputs are unavoidable, blending strategies will be adopted to reduce their overall impact. SSMI-AD's procurement team will work closely with suppliers to ensure traceability and sustainability of raw materials. This approach strengthens product stewardship, reduces the lifecycle carbon footprint of finished alloys, and aligns with SSMI-AD's overarching mission to decarbonize the supply chain through innovative material sourcing practices.

6.4 Emissions Reduction Capture

SSMI-AD acknowledges the future role of Carbon Capture and Storage (CCS) in achieving deep decarbonization of industrial processes. The company will explore the feasibility of implementing CCS technologies in emission-intensive operations such as smelting. Partnerships with technology providers and research institutions will be formed to pilot projects that assess technical, economic, and environmental viability. Potential adoption areas include flue gas CO₂ capture, pre-combustion capture, and mineral carbonation. The initiative supports long-term climate targets and aligns with evolving environmental regulations. While still nascent in India's industrial sector, SSMI-AD's proactive stance on CCS demonstrates leadership in climate innovation and risk mitigation.

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6.5 Green Power Procurement

To support India's transition to clean energy, SSMI-AD will prioritize the procurement of certified renewable electricity and invest in onsite renewable generation systems, such as solar photovoltaic panels. This strategic shift aligns with the organization's Scope 2 emissions reduction targets and decarbonization roadmap. Renewable energy usage not only ensures energy price stability and long-term savings but also demonstrates leadership in climate-conscious manufacturing. Onsite installations will be phased based on site viability, while offsite power purchase agreements will be considered where feasible. This initiative supports national energy goals, enhances energy security, and showcases SSMI-AD's commitment to sustainable energy sourcing.

6.6 Transportation Emissions

SSMI-AD acknowledges that transportation activities contribute to both direct (Scope 1) and indirect (Scope 3) emissions. To address this, the company will optimize logistics planning to reduce travel distances and fuel usage, and transition its internal vehicle fleet to electric or hybrid models. Furthermore, SSMI-AD will engage with supply chain partners to encourage adoption of low-emission freight solutions, including shared logistics and green-certified carriers. By integrating these transportation strategies, SSMI-AD aims to reduce its overall carbon footprint and demonstrate leadership in sustainable logistics while aligning with global efforts to decarbonize the industrial transport sector.

6.7 Energy Efficiency Audit

To continuously improve energy efficiency and reduce emissions, SSMI-AD will conduct detailed energy and carbon audits across all operational areas, including smelting units, workshops, logistics, and office spaces. The audits will identify energy waste, inefficiencies, and emission hotspots, enabling targeted interventions. Findings will feed into the ESG reporting framework and capital investment decisions. Internal and third-party audits will be scheduled periodically, ensuring compliance with national energy conservation rules and international best practices. Audit recommendations will be followed by action plans with assigned ownership and timelines. This ensures systematic progress in reducing energy use and carbon intensity across the value chain.

6.8 High Scope 2 Emissions from Purchased Electricity

SSMI-AD recognizes that indirect emissions from purchased electricity significantly contribute to its carbon footprint. The company is committed to reducing Scope 2 emissions by shifting to renewable energy sources, such as solar and wind, wherever feasible. Additionally, SSMI-AD will optimize electricity usage through initiatives like LED lighting, installation of high-efficiency motors, and maintaining a high power factor through automated correction systems. These measures not only contribute to emission reduction but also promote operational cost-efficiency. SSMI-AD views this transition as a strategic investment toward achieving long-term decarbonization goals and meeting regulatory and stakeholder expectations on climate responsibility.

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6.9 Technology Efficiency Improvements

SSMI-AD is dedicated to replacing outdated, energy-intensive machinery with advanced, high-efficiency systems. The company will adopt innovations such as variable frequency drives (VFDs), induction melting units, and automated process controls. Equipment upgrades will be prioritized based on lifecycle cost analysis, potential energy savings, and emission reductions. These upgrades are critical for improving operational efficiency, reducing energy consumption, and aligning with industrial decarbonization targets. Projects will be evaluated for environmental impact, return on investment, and compatibility with renewable integration. This proactive approach enables SSMI-AD to modernize operations while driving significant sustainability outcomes in its manufacturing processes.

6.10 Excessive Emissions in Primary Production

SSMI-AD aims to proactively reduce direct (Scope 1) GHG emissions arising from its core production processes. This includes transitioning to low-emission furnace technologies, enhancing combustion efficiency, and ensuring input materials are pre-treated to minimize emission load. Furthermore, sealed systems and emission capture devices will be introduced to prevent fugitive emissions from escaping into the atmosphere. These initiatives form part of SSMI-AD's broader commitment to sustainable manufacturing and environmental compliance. The company understands that reducing primary emissions is critical not just for meeting national and international climate goals but also for protecting the health and safety of local communities.

6.11 Low-Carbon Staff Training

SSMI-AD emphasizes the importance of employee awareness in achieving its energy and climate goals. Through annual mandatory training sessions, employees are educated on efficient energy usage, equipment best practices, and their contribution to GHG mitigation. These sessions foster behavioral change, encourage energy-saving initiatives, and promote a sustainability-first mindset. Practical demonstrations, visual content, and interactive modules ensure deep understanding across all levels. The training integrates global best practices and aligns with the company's ESG roadmap. This initiative strengthens internal capacity, embeds energy responsibility into daily operations, and supports SSMI-AD's long-term climate resilience and emissions reduction strategies.

6.12 High Thermal Load

SSMI-AD acknowledges that smelting operations are among the most energy-intensive in non-ferrous alloy production. To mitigate this, the company is committed to upgrading to modern, energy-efficient furnace technologies, automating temperature and material control, and streamlining process flows to reduce energy loss. Regular energy audits and performance benchmarking will be institutionalized to identify inefficiencies, implement corrective measures, and promote continuous improvement. By embedding energy management principles into core production practices, SSMI-AD aims to reduce operational costs and environmental impact while enhancing the sustainability of its manufacturing processes in alignment with ESG objectives.

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6.13 Recycling Usage Deficit

SSMI-AD embraces circular economy principles by actively promoting the use of secondary (recycled) non-ferrous metals in its production. Recycled inputs require significantly less energy—up to 95% less—compared to virgin raw materials and contribute to substantial GHG emission reductions. To address this opportunity, SSMI-AD is committed to strengthening its sourcing, segregation, and quality assurance systems for scrap materials. By improving scrap utilization efficiency and minimizing primary material dependency, SSMI-AD enhances resource sustainability, reduces environmental impact, and supports the national and global push toward responsible, low-carbon industrial practices that align with long-term ESG performance goals.


6.14 Efficient Fuel Transition

SSMI-AD will reduce the carbon intensity of its operations by transitioning to cleaner fuels such as natural gas or biomass, replacing coal, diesel, or furnace oil. The shift will be evaluated based on fuel availability, cost-effectiveness, combustion efficiency, and infrastructure compatibility. Fuel switching reduces direct (Scope 1) emissions and supports alignment with international climate commitments. This strategic move also improves air quality, reduces operating risks from fuel volatility, and enhances regulatory compliance. A phased approach will be used, with priority given to high-impact energy systems and emission hotspots. This initiative strengthens the company's pathway to sustainable and low-carbon manufacturing.

7. ESG Objectives

- Sustainability Issue** : **Efficient Heat Recovery and Gas Capture**
Objective : Optimize recovery of waste heat and gases
Measure : % heat recovery from processes
Target Value : ↑ 20%
- Sustainability Issue** : **Recovered Heat Utilization**
Objective : Increase use of recovered heat in operations
Measure : % recovered heat reused
Target Value : ↑ 25%
- Sustainability Issue** : **Carbon Emissions from High-Carbon Raw Inputs**
Objective : Reduce use of carbon-intensive materials
Measure : % reduction in high-carbon input usage
Target Value : ↓ 10%
- Sustainability Issue** : **Emissions Reduction Capture**
Objective : Install emission capture systems
Measure : % emissions captured
Target Value : ↑ 15%

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5. Sustainability Issue

: Green Power Procurement

Objective

: Increase share of renewable energy

Measure

: % electricity from green sources

Target Value

: ↑ 15%

6. Sustainability Issue

: Transportation Emissions

Objective

: Minimize emissions from logistics

Measure

: % reduction in fleet fuel consumption

Target Value

: ↓ 10%

7. Sustainability Issue

: Energy Efficiency Audit

Objective

: Identify energy-saving opportunities

Measure

: No. of audits completed

Target Value

: ↑ 1/year

8. Sustainability Issue

: High Scope 2 Emissions from Purchased Electricity

Objective

: Lower indirect emissions

Measure

: % reduction in Scope 2 emissions

Target Value

: ↓ 5%

9. Sustainability Issue

: Technology Efficiency Improvements

Objective

: Upgrade to energy-efficient systems

Measure

: % of equipment upgraded

Target Value

: ↑ 15%

10. Sustainability Issue

: Excessive Emissions in Primary Production

Objective

: Reduce process emissions

Measure

: % reduction in CO₂/ton output

Target Value

: ↓ 5%

11. Sustainability Issue

: Low-Carbon Staff Training

Objective

: Educate staff on low-carbon practices

Measure

: % staff trained on energy practices

Target Value

: ↑ 60%

12. Sustainability Issue

: High Thermal Load

Objective

: Reduce thermal energy consumption

Measure

: % thermal energy efficiency improvement

Target Value

: ↑ 10%

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13.Sustainability Issue

: Recycling Usage Deficit

Objective

: Enhance recycled material usage

Measure

: % recycled input in production

Target Value

: ↑ 10%

14.Sustainability Issue

: Efficient Fuel Transition

Objective

: Shift to lower-carbon fuels

Measure

: % of fuel replaced with cleaner alternatives

Target Value

: ↑ 30%

8. Applicable Standards, Acts, and Laws

- ISO 14001:2015 – Environmental Management Systems
- ISO 50001:2018 – Energy Management
- Carbon Disclosure Project (CDP)
- Global Reporting Initiative (GRI 302, 305)
- Aluminium Stewardship Initiative (ASI) Standards
- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- Energy Conservation Act, 2001 (India)
- Electricity Act, 2003 (India)

9. Distribution and Annual Review

SSMI-AD's Energy Consumption Policy is widely communicated to ensure awareness and alignment across all operational levels. It is shared with employees through emails, training sessions, onboarding materials, and ESG orientation, and remains accessible via the company intranet and ESG dashboard. Contractors, suppliers, auditors, and energy consultants receive the policy through contracts and vendor meetings. The ESG Committee conducts an annual review, incorporating audit data, legal updates, stakeholder feedback, and industry benchmarks. Revisions are approved by management and disclosed in the ESG report, ensuring transparency and continuous improvement toward sustainable energy use and decarbonization goals.

10. Disciplinary Action for Policy Violators

SSMI-AD maintains a zero-tolerance approach to deliberate non-compliance with its Energy Consumption Policy. Individuals or contractors found violating energy protocols may face disciplinary measures based on the severity of the breach. These may include verbal or written warnings, temporary suspension, mandatory retraining, or contract termination. In the case of external parties such as vendors or contractors, repeated violations may lead to contract blacklisting or permanent exclusion from SSMI-AD's approved vendor list.

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11. Reporting Mechanism

To foster a culture of energy responsibility, SSMI-AD has established robust, confidential reporting channels for employees and stakeholders to report inefficiencies, violations, or improvement ideas. Reports can be submitted anonymously via the ESG helpline, the internal grievance portal, or directly to the Energy Officer through a designated email. All reports are acknowledged and investigated within five working days, and outcomes are documented with follow-up actions taken. The reporting mechanism not only supports transparency but also empowers employees to contribute to our sustainability journey by actively participating in energy-saving and emission-reducing initiatives.

12. Conclusion

SSMI-AD's ESG Energy Consumption Policy serves as a strategic foundation for advancing responsible energy use and achieving climate-conscious operations. By reducing greenhouse gas emissions, improving energy efficiency, and transitioning toward sustainable practices, SSMI-AD strengthens its leadership in environmentally responsible non-ferrous alloy manufacturing. The policy reflects our long-term ESG vision—balancing operational efficiency with environmental stewardship. It underscores the belief that energy conservation is essential not just for cost reduction, but for sustaining business competitiveness, fulfilling regulatory obligations, and addressing global climate challenges. This policy is a living document that evolves with technological advancements and stakeholder expectations.

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29. Data Protection Policy

SSMI-AD/ESG/POLICY-29

1. Purpose

This policy safeguards the confidentiality, integrity, and availability of all SSMI-AD and third-party data, including intellectual property, trade secrets, and personal information. It promotes secure data handling, prevents unauthorized access, and ensures compliance with data protection standards—reinforcing trust among stakeholders and supporting responsible and resilient business operations.

2. Scope of Application

This policy applies to all employees, contractors, interns, vendors, and partners with access to SSMI-AD's data and systems. It covers all business functions, IT infrastructure, and operational domains across procurement, finance, and communication. The geographical scope includes all SSMI-AD operations in India and any international engagements or partnerships.

3. Governance

The Chief Security Officer (CSO) leads the implementation of this policy. The IT Security Team manages daily controls, system monitoring, and risk mitigation. The ESG & Ethics Committee evaluates security incidents and reviews quarterly reports. The Board of Directors ensures strategic alignment and approves budgets for cybersecurity investments and improvements.

4. Definitions

✿ PII (Personally Identifiable Information)

PII refers to any data that can be used to identify an individual, including names, contact details, identification numbers, and biometric data. Protecting PII is essential for maintaining privacy, complying with legal regulations, and preventing identity theft, data misuse, or reputational damage to individuals and the organization.

✿ Intellectual Property

Intellectual Property (IP) includes proprietary knowledge such as trade secrets, product designs, technical formulas, and custom software. Safeguarding IP ensures competitive advantage, innovation protection, and legal compliance. Unauthorized access or disclosure can lead to significant financial and reputational harm, making IP protection a critical element of information security.

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Vulnerability

A vulnerability is a known weakness or flaw in software, hardware, or internal processes that may be exploited by cyber threats. Identifying and mitigating vulnerabilities through timely updates, patches, and controls is crucial to prevent data breaches, system compromise, or operational disruptions within the organization.

*
Incident Response

Incident Response is a structured approach for detecting, managing, and recovering from information security breaches. It includes investigation, containment, mitigation, communication, and post-incident review. A strong response framework minimizes business impact, protects stakeholder trust, and ensures compliance with regulatory obligations related to data protection and cybersecurity.

5. Roles & Responsibilities

*
All Staff

All employees must actively participate in information security by attending training sessions, adhering to established security protocols, and promptly reporting any suspicious activity or potential data breaches. Their consistent vigilance is essential to maintaining the confidentiality, integrity, and availability of SSMI-AD’s information assets across daily operations.

*
Managers

Managers are responsible for enforcing role-based access controls, ensuring that only authorized personnel can access sensitive data within their teams. They must regularly review access rights, support team training, and act swiftly on any security issues, thereby maintaining compliance with SSMI-AD’s information security standards and reducing operational risk.

*
IT Team

The IT team is tasked with continuous system monitoring, vulnerability management, and implementation of technical safeguards. They apply security patches, perform risk assessments, and respond to emerging threats, ensuring SSMI-AD’s infrastructure is protected against unauthorized access, malware, and data loss, in alignment with best practices and compliance requirements.

*
Contractors/Vendors

All external contractors and vendors must adhere strictly to SSMI-AD’s information security standards. This includes signing confidentiality agreements, following secure data handling procedures, and cooperating with audits or reviews. Non-compliance may result in contract termination or legal action, as third-party risks directly impact SSMI-AD’s operational security.

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*
Compliance Officer

The Compliance Officer oversees the implementation and enforcement of the information security policy. Responsibilities include tracking policy adherence, investigating violations, and ensuring SSMI-AD meets its legal and regulatory reporting obligations. The officer also coordinates with relevant departments to strengthen controls and enhance the organization’s security culture and resilience.

6. Data Protection Policy

6.1 Adequate Backup & Recovery

SSMI-AD employs a robust data backup and disaster recovery plan to ensure continuity in the event of data loss. Critical data is backed up daily across secure, redundant locations. Recovery procedures are tested monthly to confirm their effectiveness and to meet Recovery Time Objectives (RTO) and Recovery Point Objectives (RPO). The IT team monitors backup success rates and investigates any anomalies. Detailed documentation ensures that recovery steps are understood and executable during emergencies. This approach guarantees that SSMI-AD can restore operations with minimal disruption following system failures, cyberattacks, or accidental data deletion.

6.2 Security Incident Plan

SSMI-AD maintains a well-defined Incident Response Plan (IRP) to guide timely and coordinated action during a breach of confidential or sensitive information. The plan outlines roles and responsibilities, communication protocols, breach containment strategies, forensic analysis procedures, and reporting timelines. It includes a multi-phase approach—preparation, detection, response, recovery, and post-incident review. The IRP is tested through simulation drills and updated based on evolving risks and feedback from prior incidents. This structured approach minimizes business disruption, maintains regulatory compliance, and protects stakeholder interests in the event of a security breach.

6.3 Proper Network Segmentation

To prevent lateral movement of threats within its IT infrastructure, SSMI-AD implements strategic network segmentation. Sensitive data and critical systems are isolated within designated VLANs, with firewall rules enforcing limited inter-network communication. The segmentation strategy is documented and reviewed annually. Access to each segment is granted based on roles and monitored continuously. Regular audits detect misconfigurations or potential bypasses. By compartmentalizing its networks, SSMI-AD reduces the risk of widespread damage from localized breaches and improves overall network manageability and security posture.

6.4 Cyber Risk Evaluation

SSMI-AD regularly carries out structured information security risk assessments to identify, evaluate, and mitigate vulnerabilities across its digital and physical environments. These assessments consider factors such as evolving threat landscapes, internal control effectiveness, data sensitivity, and potential business impact. The outcomes inform risk mitigation strategies, including policy updates, technical upgrades, and procedural improvements.

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A risk register is maintained to track findings, assign responsibilities, and monitor remediation efforts. These efforts ensure that the organization remains agile and prepared to address existing and emerging security threats in a timely and efficient manner.

6.5 Third-party Data Processing Non-compliance

SSMI-AD requires all third-party data processors to comply with applicable data protection laws and SSMI-AD's internal security protocols. Prior to engagement, vendors must sign data processing agreements that define confidentiality obligations, breach reporting timelines, and audit rights. Annual compliance assessments evaluate vendors' adherence to these terms. Non-compliant processors are subject to remediation plans or termination. This policy ensures that any external handling of SSMI-AD's data maintains the same level of integrity and security expected internally, preserving trust and regulatory compliance throughout the data lifecycle.

6.6 Data Consent Controls

SSMI-AD ensures transparency in its data practices by obtaining informed consent from stakeholders prior to collecting, processing, or sharing their personal or business information. Stakeholders are provided with clear, easy-to-understand privacy notices and consent forms that outline the purpose, scope, duration, and legal basis for data use. The process includes options for stakeholders to withdraw consent or request changes to their data handling preferences. Consent records are maintained securely, and any changes to data practices are communicated promptly. This ensures compliance with data protection laws and strengthens trust with clients and partners.

6.7 Managed Mobile Devices

To prevent data leaks and unauthorized access, SSMI-AD mandates that all business-related mobile devices be enrolled in a Mobile Device Management (MDM) platform. This enables remote control features such as device tracking, data wipe, and security updates. Employees are prohibited from storing company data on personal devices unless explicitly approved and secured. Regular MDM audits are conducted to ensure compliance. Unauthorized devices are denied access to company systems. With mobile access becoming increasingly common, this policy ensures consistent enforcement of security standards across all endpoints, supporting business continuity while protecting sensitive data on the move.

6.8 Cybersecurity Awareness Program

SSMI-AD prioritizes developing employee awareness and accountability in safeguarding information assets. Through structured training programs, employees learn about potential cybersecurity threats, secure data handling practices, phishing prevention, and response protocols for breaches. These sessions are updated regularly to reflect emerging risks and include interactive formats like case studies, simulation exercises, and assessments. Participation is mandatory for all staff, including new hires and contractors. The company ensures that all training aligns with regulatory standards and internal policies. By empowering personnel with knowledge and skills, SSMI-AD fosters a workplace culture that is resilient to information security challenges.

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6.9 Phishing and Social Engineering

SSMI-AD recognizes phishing and social engineering as significant threats to information security. To counter this, the company conducts frequent simulated phishing campaigns, measuring employee responsiveness and raising awareness. Training modules explain how to identify suspicious emails, phone calls, and online requests. Employees are encouraged to report any suspicious messages to IT for analysis. Lessons learned from simulations and real incidents are incorporated into policy updates. This proactive approach fosters a high level of awareness and resilience against deceptive tactics designed to manipulate staff into disclosing confidential information or granting system access.

6.10 Data Retention Plan

SSMI-AD enforces a clear and standardized records retention schedule that governs how long business and third-party data are kept and when they are securely disposed of. The schedule is based on the nature of the data, regulatory requirements, operational needs, and stakeholder agreements. It applies to both digital and physical records and includes specific timelines for retention and destruction. Secure disposal methods, such as data wiping and shredding, are used to prevent unauthorized access. Regular audits ensure compliance, and staff are trained on proper retention and destruction practices to uphold data privacy and integrity.

6.11 Data Retention Policy

SSMI-AD maintains a formal Data Retention Policy to guide the storage, archival, and disposal of information. Data is categorized based on its legal, regulatory, and operational relevance. Retention schedules are defined for each category, with automatic reminders for review or disposal. When data reaches the end of its lifecycle, it is securely deleted or destroyed in accordance with security best practices. Employees are trained on retention obligations and encouraged to avoid unnecessary data accumulation. This policy minimizes storage-related risks, ensures legal compliance, and supports efficient information management practices aligned with sustainability and data minimization goals.

6.12 Data Breach Reporting

SSMI-AD has established a secure and confidential whistleblower mechanism for reporting suspected breaches or concerns related to information security. Accessible to employees, customers, vendors, and other stakeholders, the system ensures anonymity and non-retaliation. Reports can be submitted via email, phone, or an encrypted online portal and are reviewed by designated compliance personnel. All reports are investigated promptly and transparently, with findings communicated appropriately and corrective actions implemented when necessary. This mechanism reinforces SSMI-AD's commitment to accountability, transparency, and the proactive resolution of potential risks before they escalate.

6.13 Sufficient Employee Training

At SSMI-AD, every employee plays a vital role in maintaining cybersecurity. To ensure awareness, all staff participate in mandatory annual cybersecurity training that includes policy reviews, data protection responsibilities, and real-world threat scenarios such as phishing and social engineering. Training effectiveness is assessed through simulations and knowledge checks. New hires undergo onboarding modules on information security within their first month.

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Refresher courses and awareness campaigns are also conducted in response to emerging risks. This ongoing training fosters a culture of cyber vigilance and ensures that employees act as the first line of defense against internal and external threats.

6.14 Privacy Protection Protocols

SSMI-AD applies a layered security approach to protect third-party data against unauthorized access or accidental disclosure. This includes strong encryption standards for data in transit and at rest, multi-factor authentication, access control lists, role-based user privileges, and secure physical storage areas. Network segmentation and monitoring tools are used to detect unusual access patterns or potential breaches. Only authorized personnel with a legitimate need-to-know can access sensitive information. Regular security updates, vulnerability scans, and penetration testing ensure that all data protection measures are up to date and effective against current threats.

6.15 Physical Data Theft

Physical security measures are integral to protecting sensitive information at SSMI-AD. All physical records containing confidential data are stored in locked cabinets or restricted-access rooms when not in use. Access is granted only to authorized personnel and recorded through check-in/check-out logs. Surveillance systems, visitor badges, and physical audits help monitor and restrict unauthorized entry. Employees are instructed never to leave documents unattended and to report any suspicious activity. Disposal of documents follows a secure shredding protocol. These controls prevent theft, loss, or mishandling of physical data and complement SSMI-AD's broader information security framework.

6.16 Outdated Software Vulnerabilities

To protect against known software vulnerabilities, SSMI-AD enforces a proactive patch management policy. All systems and applications are routinely assessed for updates, and patches are applied within 30 days of release. The IT team maintains an inventory of software assets and monitors vendor advisories to identify and prioritize security-critical updates. Patch deployment is tracked and verified through change management logs and endpoint reporting tools. This minimizes the window of exposure to threats exploiting outdated software and ensures that SSMI-AD's digital infrastructure remains resilient against evolving cybersecurity risks and exploits.

6.17 Authorized Access to Trade Secrets

SSMI-AD takes proactive measures to protect its intellectual property by limiting access to sensitive trade secrets to only those employees whose roles require it. Robust access controls, authentication systems, and activity logging are enforced throughout the organization. Access rights are reviewed quarterly, and changes are documented and authorized by relevant managers. Regular audits help ensure no unauthorized personnel can view or extract confidential information. All employees are trained on the sensitivity of proprietary knowledge and are legally bound by non-disclosure agreements. This approach ensures that critical knowledge and innovations remain protected from misuse, theft, or competitive exposure.

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6.18 Security Controls Audit

To ensure the effectiveness and compliance of its data protection mechanisms, SSMI-AD conducts scheduled audits of all information security controls. These audits are performed both internally and by certified external auditors and cover aspects such as access control, data encryption, backup management, and incident reporting. The audit scope includes evaluating the adequacy of preventive measures, identifying gaps, and assessing system configurations. Audit findings are documented and communicated to relevant departments for immediate action. Lessons learned are incorporated into policy updates and employee training, creating a feedback loop that continuously strengthens the organization’s security posture.

6.19 Vendor Security Practices

SSMI-AD ensures that all vendors handling company data or systems adhere to strict security standards. Before onboarding, vendors undergo a comprehensive information security assessment that evaluates data protection, system integrity, and compliance with SSMI-AD’s cybersecurity policies. Contracts include clauses enforcing adherence to security protocols and incident response obligations. Vendor performance is monitored regularly, and periodic audits are conducted to confirm ongoing compliance. Non-compliant vendors are required to take corrective action within defined timelines. By maintaining stringent oversight over third-party partners, SSMI-AD mitigates risks stemming from supply chain vulnerabilities and strengthens its overall information security posture.

6.20 Cloud Misconfigurations

SSMI-AD utilizes cloud services in accordance with strict configuration and security standards. Each cloud environment is reviewed quarterly to ensure compliance with best practices for identity management, access control, encryption, and logging. Automated tools help detect misconfigurations such as public access to sensitive files or improper firewall rules. Cloud resources are provisioned following an internal approval workflow, and permissions are regularly audited. Incident response protocols are extended to the cloud environment, ensuring prompt remediation of identified risks. Through vigilance and standardization, SSMI-AD mitigates threats arising from cloud misconfigurations and ensures safe adoption of cloud technologies.

6.21 Data Breach of PII

SSMI-AD is committed to protecting Personally Identifiable Information (PII) through strong technical and organizational safeguards. All PII is stored in encrypted form, whether in transit or at rest. Breach prevention mechanisms include intrusion detection systems, secure passwords, and access controls. In the event of a data breach, an immediate response protocol is initiated, including internal containment, forensic investigation, and stakeholder notifications as per legal requirements. Employees are trained on privacy responsibilities, and PII handling is governed by stringent policies aligned with applicable data protection laws. These measures ensure the confidentiality, integrity, and availability of personal data managed by SSMI-AD.

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6.22 Vendor Security Assessment

SSMI-AD implements a rigorous due diligence process before engaging any third-party service provider. This program evaluates potential partners—such as vendors, contractors, and data processors—for their ability to uphold high standards of information security. Assessments cover data protection protocols, breach history, cybersecurity certifications, and industry benchmarking. Contracts are only finalized once vendors agree to SSMI-AD's data security clauses and demonstrate adequate risk controls. This process reduces the likelihood of data breaches originating from third-party systems and ensures consistency in compliance with legal and organizational expectations throughout the supply chain.


6.23 Authorized Data Sharing

SSMI-AD enforces strict controls on the sharing of data both within and outside the organization. All internal and external data transfers must be authorized by designated personnel and utilize secure channels such as encrypted emails or file transfer protocols. Logging mechanisms capture the origin, destination, and contents of shared data to enable traceability. Employees are prohibited from using unauthorized devices, platforms, or methods to transmit company data. Regular audits and monitoring help detect and prevent unauthorized transfers. This policy ensures that all data sharing is purposeful, secure, and compliant with legal and contractual obligations.

7. ESG Objectives

- Sustainability Issue** : **Adequate Backup & Recovery**
Objective : Ensure regular and secure data backup
Measure : % systems with automated backup
Target Value : ↑ 100%
- Sustainability Issue** : **Security Incident Plan**
Objective : Establish incident response protocols
Measure : % incident response readiness
Target Value : ↑ 80%
- Sustainability Issue** : **Proper Network Segmentation**
Objective : Improve internal network security
Measure : % of network zones segmented
Target Value : ↑ 60%
- Sustainability Issue** : **Cyber Risk Evaluation**
Objective : Conduct regular cyber risk assessments
Measure : No. of cyber risk assessments conducted
Target Value : ↑ 1/year

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5. Sustainability Issue

: Third-party Data Processing Non-compliance

Objective

: Ensure vendor compliance with data protection standards

Measure

: % compliant third-party processors

Target Value

: ↑ 60%

6. Sustainability Issue

: Data Consent Controls

Objective

: Implement clear consent mechanisms

Measure

: % systems with consent control

Target Value

: ↑ 100%

7. Sustainability Issue

: Managed Mobile Devices

Objective

: Secure mobile access to company systems

Measure

: % mobile devices under MDM

Target Value

: ↑ 70%

8. Sustainability Issue

: Cybersecurity Awareness Program

Objective

: Educate staff on security practices

Measure

: % employees trained

Target Value

: ↑ 100%

9. Sustainability Issue

: Phishing and Social Engineering

Objective

: Strengthen user awareness against attacks

Measure

: % reduction in phishing incident reports

Target Value

: ↓ 50%

10.Sustainability Issue

: Data Retention Plan

Objective

: Define and apply retention policies

Measure

: % data mapped under retention policy

Target Value

: ↑ 100%

11.Sustainability Issue

: Data Retention Policy

Objective

: Establish clear retention timelines

Measure

: No. of formal retention policies approved

Target Value

: ↑ 1

12.Sustainability Issue

: Data Breach Reporting

Objective

: Ensure timely reporting of breaches


Measure

: % incidents reported within SLA

Target Value

: ↑ 100%

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**ESG - Sustainability Management
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13.Sustainability Issue

: Sufficient Employee Training

Objective

: Improve digital hygiene awareness

Measure

: % workforce trained on info security

Target Value

: ↑ 100%

14.Sustainability Issue

: Privacy Protection Protocols

Objective

: Strengthen data privacy controls

Measure

: % systems with privacy settings enabled

Target Value

: ↑ 75%

15.Sustainability Issue

: Physical Data Theft

Objective

: Secure physical access to data assets

Measure

: % restricted access areas monitored

Target Value

: ↑ 100%

16.Sustainability Issue

: Outdated Software Vulnerabilities

Objective

: Eliminate software security gaps

Measure

: % critical systems updated monthly

Target Value

: ↑ 100%

17.Sustainability Issue

: Authorized Access to Trade Secrets

Objective

: Enforce access control

Measure

: % of sensitive files with role-based access

Target Value

: ↑ 60%

18.Sustainability Issue

: Security Controls Audit

Objective

: Assess IT security effectiveness

Measure

: No. of audits completed

Target Value

: ↑ 1/year

19.Sustainability Issue

: Vendor Security Practices

Objective

: Improve vendor information security standards

Measure

: % vendors passing security reviews

Target Value

: ↑ 80%

20.Sustainability Issue

: Cloud Misconfigurations

Objective

: Secure cloud infrastructure

Measure

: % cloud systems verified and secured

Target Value

: ↑ 100%

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21.Sustainability Issue

: Data Breach of PII

Objective

: Protect personal data

Measure

: % PII encrypted in storage

Target Value

: ↑ 100%

22.Sustainability Issue

: Vendor Security Assessment

Objective

: Evaluate third-party security practices

Measure

: No. of vendors assessed

Target Value

: ↑ 10

23.Sustainability Issue

: Authorized Data Sharing

Objective

: Monitor and restrict data sharing

Measure

: % systems with data-sharing controls

Target Value

: ↑ 100%

8. Applicable Standards, Laws & Acts

- Information Technology Act,
- 2000 (with PII rules); Indian Contract Act.
- GDPR (where applicable);
- FCPA (requires data protection); OECD Guidelines (grain 7);
- GRI 418; ISO 27001;
- ASI performance requirements;
- UN Global Compact principles on data rights.

9. Distribution and Annual Review

SSMI-AD ensures its Information Security Policy is effectively communicated through onboarding sessions, annual refresher trainings, and access via the intranet and notice boards in English and regional languages. For external stakeholders, the policy is embedded in vendor contracts and discussed during procurement evaluations. This ensures all employees, contractors, and partners understand and adhere to security requirements. The policy is reviewed annually or after major incidents by IT and ESG teams, incorporating audit findings, vulnerability assessments, and stakeholder feedback. Updates address emerging threats and regulatory changes, ensuring the policy remains relevant, effective, and aligned with SSMI-AD's ESG and data protection objectives.

10. Disciplinary Action for Violators

Violations of this policy are taken seriously and may lead to disciplinary consequences depending on severity. Actions include formal warnings, suspension, or termination of employment or contracts. In cases of deliberate or gross negligence, SSMI-AD may initiate legal proceedings under applicable data protection laws.

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For vendors, breaches may result in contract termination and reporting to authorities. These consequences serve as a strong deterrent and highlight SSMI-AD's zero-tolerance approach to information security violations, reinforcing the importance of safeguarding sensitive data and upholding organizational integrity, legal compliance, and the ethical responsibilities expected from all internal and external parties.

11. Reporting Mechanism

SSMI-AD maintains a 24/7 reporting system for suspected or actual information security incidents. Reports can be submitted via IT support tickets, a dedicated email address, or a hotline. Upon receipt, the Incident Response Team acts within one hour to contain and investigate the issue. All incidents are reviewed and summarized in quarterly reports to the ESG Committee, ensuring organizational oversight and accountability. In case of serious breaches, escalation is handled according to legal notification requirements. This mechanism encourages prompt reporting and response, enabling faster recovery, regulatory compliance, and assurance to stakeholders of SSMI-AD's commitment to transparency and security.

12. Conclusion

SSMI-AD is committed to protecting its data environment through strong policy enforcement, technological safeguards, and workforce awareness. By implementing robust controls, conducting regular training, and maintaining rapid incident response capabilities, the organization upholds the confidentiality, integrity, and availability of its data. This Information Security Policy reinforces SSMI-AD's dedication to responsible governance and ESG principles, while fostering trust among clients, partners, regulators, and employees. As cyber threats evolve, SSMI-AD continues to adapt and enhance its security practices, ensuring the sustainable and ethical management of data across all business functions and operational geographies.

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30. Workplace Safety Management Policy

SSMI-AD/ESG/POLICY-30

1. Purpose

This policy articulates SSMI-AD's commitment to safeguarding the physical and psychological well-being of all employees and contractors. Our aim is to minimize workplace injuries, occupational illnesses, and stress through proactive measures, training, and continuous improvement in health and safety practices.

2. Scope of Application

This policy applies to all employees, contractors, site visitors, and third-party workers involved with SSMI-AD. It covers all business areas including smelting, casting, ore processing, material handling, maintenance, logistics, and office environments. The policy is applicable to all operational locations and facilities across India where SSMI-AD conducts its manufacturing and allied activities.

3. Governance

The Health & Safety Committee, led by the EHS Manager and reporting to the ESG Oversight Committee, is responsible for implementing this policy, conducting audits, tracking performance, and identifying risks. The committee ensures ongoing compliance and continuous improvement. Management conducts formal reviews of health and safety performance on a quarterly basis.

4. Definition

☀ Heat Stress

Heat stress occurs when the body is unable to cool itself effectively, often due to prolonged exposure to high temperatures in smelting or casting environments. SSMI-AD addresses this risk through hydration protocols, rest breaks, ventilation systems, and awareness training to prevent heat-related illnesses like heat exhaustion or heatstroke.

☀ Burn Risk

Burn risks arise from direct or indirect contact with molten metal, hot surfaces, or equipment. SSMI-AD implements strict safety measures such as thermal PPE, equipment insulation, signage, and safe operating procedures. Regular training ensures that employees understand burn hazards and response actions to mitigate accidents in high-heat work areas.

☀ CO Exposure

Carbon monoxide (CO) is a toxic, colorless gas produced by incomplete combustion. At SSMI-AD, CO risks are managed through real-time air quality monitoring, exhaust ventilation, and use of gas detectors.

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Workers in confined spaces or near combustion processes receive specific training and are equipped with respiratory protection when necessary.

✿ PPE (Personal Protective Equipment)

PPE is critical in minimizing workplace injuries. At SSMI-AD, PPE includes gloves, helmets, face shields, safety footwear, respirators, and earplugs, tailored to job-specific hazards. Mandatory usage, regular inspections, proper fitment, and user training ensure employees are consistently protected from chemical, physical, and thermal hazards across all operations.

✿ Psychosocial Risk

Psychosocial risks refer to mental and emotional stressors in the workplace, such as excessive workload, long shifts, or harassment. SSMI-AD promotes a healthy work culture through fair scheduling, counseling support, open communication channels, and zero-tolerance policies on bullying, thereby fostering psychological safety and employee well-being.

5. Roles and Responsibilities

✿ Top Management

Top Management is responsible for setting the vision and strategic direction for health and safety. They allocate necessary resources, define key performance targets, and review outcomes regularly. Their leadership ensures a culture of safety is embedded across all operations, reinforcing compliance, accountability, and continuous improvement in workplace safety.

✿ EHS Manager

The EHS Manager develops and maintains all health and safety programs, conducts regular audits, and ensures regulatory compliance. They identify risks, coordinate incident investigations, and lead safety training initiatives. Reporting to top management, they serve as the central authority on occupational health and environmental safety at SSMI-AD.

✿ Supervisors/Line Managers

Supervisors and Line Managers are responsible for day-to-day implementation of safety procedures. They ensure that workers are trained, use PPE properly, and follow safe work practices. They also conduct toolbox talks, monitor compliance, and immediately address safety breaches to maintain a hazard-free and productive work environment.

✿ Employees and Contractors

Employees and contractors are expected to strictly follow all health and safety protocols. This includes proper PPE usage, hazard reporting, participating in training sessions and drills, and stopping unsafe work practices. Their active involvement is crucial to sustaining a safe workplace and preventing accidents or environmental harm.

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Workers' Committees

Workers' Committees serve as a platform for open dialogue on health and safety. They discuss risks, report concerns, review incident trends, and suggest improvements. By representing employee perspectives, they play a critical role in shaping proactive safety measures and promoting a participatory safety culture at SSMI-AD.

6. Workplace Safety Management Policy

6.1 Fire, Explosions, and Slag/Fume Hazards

Fire and explosion risks in metal processing are mitigated at SSMI-AD through fire-resistant infrastructure, real-time detection systems, and dedicated emergency exits. Slag handling procedures are standardized, and fume extraction systems are routinely maintained to prevent flare-ups and airborne health hazards. Fire extinguishers are strategically placed and inspected regularly. All employees participate in fire drills and emergency preparedness exercises to ensure rapid response capability. Training programs are conducted to educate the workforce on slag reactivity and safe fume management. SSMI-AD's holistic approach to fire and fume safety ensures operational continuity and protection for all site personnel.

6.2 Employee Wellbeing Initiatives

Recognizing mental health as a critical component of overall well-being, SSMI-AD supports employees through various psychological wellness initiatives. These include access to confidential counseling services, stress management workshops, and wellness awareness campaigns. Managers are trained to recognize signs of stress and provide timely support or referrals. Open communication channels and anonymous feedback systems ensure employees can express concerns without stigma. Additionally, flexible scheduling and workload balancing strategies are in place to prevent burnout. These efforts contribute to a healthier, more resilient workforce and a more supportive organizational culture.

6.3 Carbon Monoxide and Toxic Gas Exposure

To manage risks from carbon monoxide (CO) and toxic gases, SSMI-AD has installed fixed and portable detectors in enclosed, confined, or poorly ventilated spaces. Ventilation systems are activated when unsafe gas levels are detected, and access to such areas is strictly controlled. Only trained personnel are allowed entry, with proper PPE and real-time monitoring. The company regularly conducts air quality audits and refresher training to ensure continuous awareness of gas-related hazards. SSMI-AD's zero-compromise approach aims to protect workers from unseen but highly dangerous inhalation risks, maintaining a safe breathing environment at all times.

6.4 Health Complaint System

SSMI-AD has established a transparent and confidential complaints procedure to allow employees to report health and safety concerns without fear of retaliation. The mechanism includes formal and informal reporting options, such as suggestion boxes, direct supervisor reporting, and a dedicated safety hotline. All complaints are logged, investigated promptly, and followed up with corrective actions where necessary. Whistleblower protection is strictly enforced. The process also allows for anonymous reporting and tracks complaint resolution to ensure systemic issues are addressed, thereby creating a culture of openness, trust, and continuous improvement.

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6.5 Adequate Training and Awareness

SSMI-AD ensures that every employee is equipped with the necessary knowledge and skills to manage site-specific hazards through mandatory induction and regular refresher programs. Specialized training modules cover emergency response, chemical handling, equipment safety, and ergonomics. Training effectiveness is evaluated through assessments and practical drills. Visual aids, safety posters, and toolbox talks reinforce key messages daily. Contractors and temporary staff are included in training initiatives to maintain consistency across the workforce. This emphasis on continuous learning creates a safety-conscious culture where employees are confident in their roles and proactive in hazard prevention.

6.6 Workplace Radiation Controls

In operations where radiation-emitting equipment or materials are present, SSMI-AD enforces strict safety protocols to protect employees. This includes shielding work areas, restricting access to authorized personnel, and maintaining radiation exposure monitoring systems. Radiation zones are clearly marked, and employees receive training on safe handling practices and emergency response procedures. Regular inspections and dosimeter readings are conducted to track exposure levels and ensure they remain within permissible limits. Compliance with local and international radiation safety regulations is ensured through audits and third-party reviews.

6.7 Safe Contractor Practices

SSMI-AD holds contractors to the same high safety standards as direct employees. All contractors must complete site-specific safety inductions and present valid certifications before commencing work. Safety audits, joint inspections, and performance reviews are conducted regularly to monitor contractor compliance. Contractors are required to use appropriate PPE, follow SSMI-AD's procedures, and participate in safety briefings. Non-compliance results in corrective actions, up to and including removal from the site. Through these stringent controls, SSMI-AD ensures that external parties uphold its health and safety expectations and contribute positively to a safe operational environment.

6.8 Operational Safety Audits

SSMI-AD implements a systematic program for the inspection and audit of all machinery and equipment to detect defects, wear, or unsafe conditions before they pose a hazard. Inspection schedules are tailored based on equipment type, usage frequency, and risk level. Qualified personnel conduct inspections and document findings for timely maintenance or corrective action. In addition to routine checks, audits are carried out to ensure compliance with regulatory requirements and internal safety standards. This process reduces equipment failure incidents and supports the organization's commitment to operational safety and reliability.

6.9 Premises Safety Assurance

SSMI-AD extends its occupational health and safety protocols to all contractors, visitors, and other non-employee workers on site. All third-party personnel are required to undergo health and safety induction training prior to site entry. They are provided with appropriate PPE and briefed on site-specific hazards and emergency procedures. SSMI-AD conducts regular audits of contractor compliance and includes them in scheduled safety drills and health programs.

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These practices ensure that every individual, regardless of employment status, benefits from a safe working environment while maintaining operational consistency and legal compliance.

6.10 Physical Injuries from Mechanical Operations

SSMI-AD prevents injuries related to machinery and manual tasks by implementing strict engineering and administrative controls. All machines are equipped with safety guards, and lockout/tagout (LOTO) procedures are enforced during maintenance and repairs. Employees handling heavy materials undergo ergonomic training, and tasks are assessed for strain and fatigue risks. Lifting aids and automation are introduced where feasible. Supervisors regularly inspect workstations to identify unsafe practices or deteriorating equipment. This comprehensive approach ensures that employees are shielded from pinch points, moving parts, and overexertion—making mechanical safety a daily priority in operations.

6.11 Workplace Hazard Analysis

SSMI-AD prioritizes employee well-being by regularly conducting health and safety risk assessments across all operational areas. These assessments identify workplace hazards, evaluate the severity of risks, and guide the implementation of preventive and corrective actions. The process includes input from supervisors and workers, and outcomes are documented and reviewed periodically. By continuously updating these assessments in response to operational or regulatory changes, SSMI-AD ensures a dynamic risk management approach that promotes a safer, healthier, and legally compliant working environment for all employees and associated personnel.

6.12 Psychological Stress and Worker Burnout

Recognizing the importance of mental well-being, SSMI-AD integrates psychological health into its safety framework. The company promotes a balanced workload, offers flexible work arrangements where possible, and encourages regular breaks. Confidential counseling services are available for employees experiencing stress, anxiety, or workplace-related challenges. Managers are trained to identify early signs of burnout and provide supportive interventions. Open channels of communication, including anonymous feedback and mental wellness workshops, enable employees to share concerns and seek help. By fostering emotional resilience and supportive work culture, SSMI-AD enhances overall morale and reduces stress-related absenteeism.

6.13 Injury Prevention Program

SSMI-AD proactively addresses the risk of repetitive strain injuries by designing ergonomic workplaces and promoting safe working practices. Ergonomic assessments are conducted for workstations involving repetitive motion or prolonged standing, and modifications are implemented to reduce strain. Employees are encouraged to report discomfort early, and they receive training on posture, proper lifting techniques, and workstation adjustments. Job rotation schedules are introduced to vary physical tasks. These interventions are aimed at preventing musculoskeletal disorders, improving worker comfort, and enhancing long-term employee productivity and engagement.

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6.14 Noise and Vibration Exposure

SSMI-AD is committed to protecting employees from long-term effects of excessive noise and vibration. Engineering controls such as acoustic enclosures and vibration dampeners are installed on machinery. High-noise tasks are scheduled during shifts with minimal staffing to reduce exposure. Employees working in noise-intensive zones are required to wear hearing protection, and annual audiometric testing is provided to monitor potential hearing loss. Ergonomic assessments and task redesign are carried out to reduce exposure to repetitive vibration. Through these measures, SSMI-AD ensures that the physical environment supports the health and comfort of its workforce.

6.15 Workplace Safety Training

SSMI-AD ensures that all employees receive robust, role-specific training to identify and manage workplace hazards effectively. Training modules are designed around industry best practices and relevant occupational health and safety laws. Key topics include chemical handling, equipment safety, emergency response, ergonomic practices, and use of personal protective equipment. New hires receive onboarding training, while existing staff attend periodic refreshers to stay updated on evolving risks and safety procedures. By fostering awareness and skill development, SSMI-AD empowers employees to proactively contribute to a safe and compliant work environment.

6.16 Chemical Exposure

To minimize risks from chemical exposure, SSMI-AD enforces stringent control measures, including the use of sealed chemical storage, local exhaust ventilation, and spill containment systems. All chemical handlers receive specific training on the safe use of volatile organic compounds (VOCs), acids, and metal fumes. Only trained personnel are authorized to access designated chemical handling zones. Routine air sampling and hazard communication sessions are held to maintain awareness. SSMI-AD prioritizes both acute and chronic exposure prevention, ensuring all employees understand the risks and have the tools and knowledge to work safely with hazardous substances.

6.17 Incident Response Plan

To ensure swift and effective response during emergencies, SSMI-AD maintains a detailed health and safety emergency action plan. This plan outlines specific procedures for incidents such as fires, chemical spills, falls, and equipment failures. It defines employee roles, communication protocols, evacuation routes, and response coordination with external emergency services. Employees are trained on the plan through mock drills and simulations, ensuring readiness across shifts. The plan is reviewed and updated regularly to reflect site modifications, regulatory changes, and lessons learned from previous incidents, ensuring optimal preparedness.

6.18 Sound Level Management

SSMI-AD controls noise exposure by implementing engineering and administrative solutions in areas where equipment and processes generate high decibel levels. Measures include installing noise barriers, using acoustic enclosures, and isolating noisy equipment. Workers in affected areas are provided with hearing protection such as earmuffs or plugs. Noise mapping and regular decibel level assessments are conducted to ensure compliance with legal limits. Job rotation is encouraged to limit prolonged exposure. These practices collectively protect employees from hearing damage, enhance workplace comfort, and support compliance with occupational health standards.

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6.19 Heat Stress in High Temperature Work Zones

SSMI-AD prioritizes the health of employees working in hot environments by implementing proactive measures to mitigate heat stress. These include installing cooling stations, scheduling regular hydration breaks, rotating shifts to minimize prolonged exposure, and conducting thermal stress awareness programs. Environmental monitoring tools help identify critical zones, while supervisors are trained to detect early symptoms of heat-related illnesses. Employees are encouraged to report discomfort without fear of retaliation. These practices not only safeguard worker health but also sustain productivity by reducing heat-induced fatigue and ensuring a more comfortable and resilient work environment.

6.20 Hazardous Exposure Control

SSMI-AD implements stringent control measures to safeguard workers from exposure to hazardous substances used in manufacturing processes. These include safe storage and labeling of chemicals, clearly defined handling procedures, and use of appropriate personal protective equipment (PPE). Ventilation systems are installed in high-risk areas to maintain air quality, and exposure levels are regularly monitored. Employees are trained in chemical safety protocols, including spill response and first aid. By combining engineering controls, procedural safeguards, and continuous education, SSMI-AD ensures a safe and compliant working environment.

6.21 Thermal Burns & Molten Metal Exposure

SSMI-AD recognizes the severe hazards posed by molten metal and high-temperature operations. To prevent thermal burns, the company mandates the use of heat-resistant personal protective equipment (PPE), installs safety barriers around furnaces and tapping stations, and enforces safe work procedures. Employees working in smelting areas undergo rigorous and periodic training on burn prevention and emergency response. Routine supervision and equipment checks ensure compliance with safety protocols. By embedding safety into operational practices, SSMI-AD aims to eliminate thermal burn incidents and foster a culture of personal accountability and collective vigilance in high-risk areas.


6.22 Employee Health Screening

To protect employee health, SSMI-AD conducts periodic medical examinations, especially for those exposed to occupational risks such as fumes, heat, or noise. Health check-ups are administered by certified medical professionals and include general wellness screenings and specialized assessments based on job hazards. These programs facilitate early detection of work-related illnesses, allowing timely intervention. Employees are informed of their health status, and medical data is treated with strict confidentiality. SSMI-AD uses aggregated health data to guide workplace improvements and risk mitigation strategies, enhancing employee welfare and organizational sustainability.

7. ESG Objectives


1. Sustainability Issue	: Fire, Explosions, and Slag/Fume Hazards
Objective	: Minimize fire and explosion risks
Measure	: No. of fire drills conducted
Target Value	: ↑ 6

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- | | |
|---|--|
| 2. Sustainability Issue
Objective
Measure
Target Value | : Employee Wellbeing Initiatives
: Enhance overall employee health and wellbeing
: % employees participating in wellbeing programs
: ↑ 70% |
| 3. Sustainability Issue
Objective
Measure
Target Value | : Carbon Monoxide and Toxic Gas Exposure
: Reduce exposure to hazardous gases
: % work areas monitored for CO and toxic gases
: ↑ 90% |
| 4. Sustainability Issue
Objective
Measure
Target Value | : Health Complaint System
: Establish responsive health issue reporting
: No. of health complaints logged and resolved
: ↑ 80% |
| 5. Sustainability Issue
Objective
Measure
Target Value | : Adequate Training and Awareness
: Improve health and safety training coverage
: % employees trained on safety procedures
: ↑ 100% |
| 6. Sustainability Issue
Objective
Measure
Target Value | : Workplace Radiation Controls
: Monitor and control radiation exposure
: % compliance with radiation safety standards
: ↑ 100% |
| 7. Sustainability Issue
Objective
Measure
Target Value | : Safe Contractor Practices
: Enforce contractor health and safety compliance
: % contractors audited for safety
: ↑ 75% |
| 8. Sustainability Issue
Objective
Measure
Target Value | : Operational Safety Audits
: Conduct regular safety audits
: No. of audits completed
: ↑ 1/year |
| 9. Sustainability Issue
Objective
Measure
Target Value | : Premises Safety Assurance
: Maintain safe working environments
: % premises inspected and certified safe
: ↑ 65% |

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10.Sustainability Issue : Physical Injuries from Mechanical Operations

Objective : Reduce injury incidents
Measure : No. of injuries reported
Target Value : ↓ 10%

11.Sustainability Issue : Workplace Hazard Analysis

Objective : Identify and mitigate hazards
Measure : No. of hazard analyses performed
Target Value : ↑ 6

12.Sustainability Issue : Psychological Stress and Worker Burnout

Objective : Support mental health and reduce burnout
Measure : % employees using mental health resources
Target Value : ↑ 30%

13.Sustainability Issue : Injury Prevention Program

Objective : Implement injury reduction initiatives
Measure : % injury rate reduction
Target Value : ↓ 15%

14.Sustainability Issue : Noise and Vibration Exposure

Objective : Control exposure to harmful noise/vibration levels
Measure : % employees with protective equipment
Target Value : ↑ 100%

15.Sustainability Issue : Workplace Safety Training

Objective : Increase safety knowledge and skills
Measure : No. of training sessions held
Target Value : ↑ 8


16.Sustainability Issue : Chemical Exposure

Objective : Minimize chemical exposure risks
Measure : % work areas with chemical monitoring
Target Value : ↑ 100%

17.Sustainability Issue : Incident Response Plan

Objective : Enhance emergency preparedness
Measure : No. of emergency drills conducted
Target Value : ↑ 4

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18.Sustainability Issue

: Sound Level Management

Objective

: Maintain sound within safe limits

Measure

: % compliance with sound level standards

Target Value

: ↑ 100%

19.Sustainability Issue

: Heat Stress in High Temperature Work Zones

Objective

: Prevent heat-related illnesses

Measure

: % heat stress incidents reported

Target Value

: ↓ 0

20.Sustainability Issue

: Hazardous Exposure Control

Objective

: Control worker exposure to hazards

Measure

: % personal protective equipment usage

Target Value

: ↑ 100%

21.Sustainability Issue

: Thermal Burns & Molten Metal Exposure

Objective

: Reduce burn incidents

Measure

: No. of burn injuries

Target Value

: ↓ 0

22.Sustainability Issue

: Employee Health Screening

Objective

: Early detection of work-related health issues

Measure

: % employees screened annually

Target Value

: ↑ 100%

8. Applicable Standards, Laws, Acts

- Legal: Factories Act, 1948;
- Employees' Compensation Act, 1923; Indian Boiler Regulations
- International: SA8000;
- ASI Performance Standard (EHS section);
- UN Global Compact;
- OECD Guidelines; GRI 403; ISO 45001 (aligned)

9. Distribution and Annual Review

SSMI-AD's Health & Safety Policy is shared through multiple channels to ensure comprehensive awareness. It is accessible via the internal intranet, included in new hire induction kits, and displayed prominently in high-risk areas. The policy is integrated into EHS orientation sessions and contractor training to ensure third-party compliance.

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Ongoing reinforcement through safety meetings and toolbox talks promotes a culture of shared accountability. Reviewed annually by the Health & Safety Committee, the policy incorporates audit findings, incident data, feedback, and regulatory updates. Approved revisions by ESG Leadership ensure continued relevance, supporting proactive risk management and stakeholder well-being across SSMI-AD's operations.

10. Disciplinary Action for Violations

To ensure strict compliance, SSMI-AD enforces disciplinary measures against any breach of health and safety protocols. Violations—such as failure to wear required PPE, bypassing safety procedures, or willful endangerment—may result in verbal or written warnings, mandatory retraining, suspension, or even termination depending on severity and repetition. Contractors exhibiting repeated non-compliance may be delisted and banned from future work. All actions are administered fairly, in line with company policy and national labor laws. This disciplinary framework reinforces the seriousness of health and safety practices and serves as a deterrent against unsafe behaviors across all operational levels.

11. Reporting Mechanism

SSMI-AD provides multiple safe and accessible channels for employees, contractors, and visitors to report hazards, near misses, incidents, or safety concerns. Reports can be submitted confidentially through a dedicated EHS hotline or via a secure mobile reporting application. Concerns may also be raised openly during safety committee meetings or toolbox talks. All reports are acknowledged, investigated promptly by the EHS team, and documented in compliance records. Corrective actions are taken where needed, and outcomes are transparently communicated to affected parties. This open and responsive mechanism fosters a culture of trust, empowerment, and shared responsibility in maintaining workplace safety.

12. Conclusion

At SSMI-AD, health and safety are integral to operational excellence and employee well-being. We are committed to fostering a proactive, inclusive, and zero-harm workplace through robust governance, regular risk assessments, training, hazard control, and stakeholder engagement. Our Health & Safety Policy is not just a compliance requirement but a core business value. Through continuous improvement and strong leadership, we aim to prevent injuries, protect lives, and uphold environmental and human rights standards. Every employee and partner has a role in advancing this safety culture, ensuring that our operations across India remain safe, resilient, and aligned with our ESG principles.

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31. Biological Diversity Conservation Policy

SSMI-AD/ESG/POLICY-31

1. Purpose

The purpose of this policy is to establish SSMI-AD's commitment to conserving biodiversity, protecting local ecosystems, and ensuring animal welfare across its operations and supply chain. This aligns with our broader ESG objectives and aims to minimize adverse impacts on species, habitats, and genetic resources from industrial activities.

2. Scope of Application

This policy applies to all employees, departments, suppliers, contractors, and partners involved in SSMI-AD's operations. It covers site development, raw material sourcing, logistics, production, and waste disposal activities. The geographical scope includes all current and future operational or project sites across India, especially those affecting sensitive ecological zones.

3. Governance

The Environmental Management Committee, led by the Head of ESG and supported by the EHS Manager, Legal Advisor, and Sustainability Coordinator, will oversee the implementation of the Biodiversity Policy. This committee will monitor compliance, evaluate performance, and ensure continual improvement through regular reporting, stakeholder engagement, and periodic policy reviews.

4. Definitions

✿ Biodiversity

Biodiversity refers to the rich variety of life on Earth, encompassing all species of plants, animals, microorganisms, their genes, and the ecosystems they form. It is essential for maintaining ecosystem services, resilience, and overall environmental balance, and supports human well-being, sustainable development, and natural resource preservation.

✿ Ecosystem

An ecosystem is a dynamic system formed by a community of living organisms (plants, animals, and microbes) interacting with one another and with their non-living environment (air, water, and soil). Ecosystems function as units and are critical for services like water purification, climate regulation, and nutrient cycling.

✿ Animal Welfare

Animal welfare involves the responsible and humane treatment of animals, ensuring their physical and psychological well-being. This includes access to adequate food, water, shelter, healthcare, and protection from cruelty or neglect. Promoting animal welfare also reflects ethical, legal, and societal values regarding the care of living beings.

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Habitat

A habitat is the natural home or environment where a particular species of plant, animal, or microorganism lives and reproduces. It provides essential resources such as food, water, shelter, and breeding grounds. Protecting habitats is vital for species survival and for conserving ecological balance and biodiversity.

5. Roles and Responsibilities

Top Management

Top Management plays a crucial role in biodiversity conservation by setting strategic targets, integrating biodiversity goals into company objectives, and allocating adequate resources. They ensure organizational accountability and demonstrate leadership by supporting initiatives that preserve natural habitats, protect species, and align operations with national and global biodiversity commitments.

EHS Department

The EHS Department is responsible for conducting environmental impact assessments, monitoring biodiversity indicators, and ensuring compliance with environmental laws. They track ecosystem health, identify potential risks, and implement mitigation plans. Their role is essential in maintaining ecological balance and supporting continuous improvement in biodiversity performance across operations.

Operations

The Operations team ensures that day-to-day activities do not harm natural habitats or disturb biodiversity. They implement measures to prevent pollution, manage waste responsibly, and restore or rehabilitate impacted areas. Their practices are aligned with biodiversity conservation protocols and contribute to minimizing the company's ecological footprint.

Procurement

The Procurement team ensures that raw materials, goods, and services are sourced in a biodiversity-conscious manner. This includes vetting suppliers for sustainable practices, avoiding products linked to deforestation or habitat loss, and promoting responsible supply chains. Their role supports ethical and environmentally sustainable sourcing across the organization.

Employees

Employees are responsible for adhering to biodiversity policies, participating in training, and reporting any activities that may harm biodiversity. They serve as the eyes and ears on the ground, supporting biodiversity preservation through daily actions and fostering a workplace culture that respects nature and encourages sustainable practices.

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6. Biological Diversity Conservation Policy

6.1 Pollution Exposure Effects

SSMI-AD recognizes that noise and air pollution can severely affect the health and well-being of surrounding communities. We will minimize these impacts through regular emissions monitoring, maintaining equipment in optimal condition, and using noise barriers or operational timing restrictions when necessary. Our approach will be rooted in national air and noise quality standards and in proactive engagement with nearby residents. Mitigating pollution not only supports biodiversity but also protects the human health of vulnerable groups such as children, the elderly, and those with respiratory conditions.

6.2 Proper Disposal Impact

Improper waste handling can lead to contamination of soil and water, harming biodiversity and disrupting natural habitats. SSMI-AD will implement a responsible waste management system that prioritizes reduction, reuse, recycling, and environmentally safe disposal. No waste will be openly dumped or disposed of near sensitive habitats or protected areas. Hazardous and non-hazardous waste will be segregated, tracked, and treated as per best environmental practices. Our waste strategy aligns with our overall ESG principles and supports long-term ecosystem preservation and public health.

6.3 Placement of Local Fauna

Operations involving land clearing, machinery, or construction can inadvertently drive away or endanger local wildlife. SSMI-AD will take deliberate steps to minimize such impacts through environmentally sensitive planning and implementation. Habitat corridors will be maintained, noise dampening measures employed, and construction activities timed to avoid key breeding or migration periods. Fencing and wildlife-safe lighting will also be installed where required. We believe in coexisting with the natural world and will tailor our activities to preserve the ecological balance of the areas where we operate.

6.4 Neglected Animal Rights

Though SSMI-AD does not directly engage in animal-related activities, we acknowledge that our facilities may interact with local wildlife, especially in semi-rural or green belt zones. We will ensure that such interactions are managed with compassion and minimal disturbance. Fencing, proper waste containment, and humane deterrents will be implemented to prevent harm. Staff will be trained in animal welfare awareness and emergency response involving wildlife. Our commitment to biodiversity includes respect for the welfare of all animals, even those indirectly affected by our presence.

6.5 Biodiversity Disclosure Gaps

SSMI-AD believes in transparency as a cornerstone of responsible environmental management. We will publish annual biodiversity impact reports in accordance with GRI 304 (Biodiversity) guidelines. Reports will detail our ecosystem interactions, mitigation measures, and conservation efforts. Where feasible, independent third-party audits and community reviews will be included.

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Disclosures will be accessible to regulators, investors, civil society, and the general public. Through open reporting, we aim to build trust and demonstrate accountability, while continually improving our performance in biodiversity preservation.

6.6 Environmental Equity Gaps

SSMI-AD acknowledges that affected communities must have a voice in decisions that impact their environment and biodiversity. We will create inclusive platforms for stakeholder engagement where residents, NGOs, and local leaders can share concerns and suggestions. Biodiversity-related decisions will be made transparently, incorporating public input, especially from vulnerable and indigenous groups. Our engagement efforts will include regular community dialogues, awareness sessions, and grievance mechanisms to ensure accountability. Ensuring community participation is a key principle of our ESG approach to fostering environmental justice and equity.

6.7 Encroachment on Protected Areas

SSMI-AD will ensure that none of its operations infringe upon wildlife sanctuaries, national parks, biodiversity hotspots, or ecologically sensitive zones. Site selection will be guided by comprehensive ecological zoning assessments and environmental clearances. In cases where proximity to such areas is unavoidable, enhanced safeguards and biodiversity preservation measures will be implemented. We recognize the ecological and cultural importance of protected areas and commit to preserving their integrity. All new development plans will include a biodiversity sensitivity review as part of the planning and approval process.

6.8 Habitat Destruction Affecting Livelihoods

SSMI-AD understands that local ecosystems often directly support the livelihoods of nearby communities. Our industrial footprint will be managed to avoid compromising fishing, agriculture, forest gathering, or other traditional practices. Prior to any site expansion or new development, we will conduct ecological and social impact assessments to identify risks to local livelihoods. Where risks are found, mitigation plans will be implemented in collaboration with affected parties. Preserving natural habitats is not only an environmental responsibility but a socioeconomic one, aligned with our commitment to sustainable and inclusive development.

6.9 Use of Chemicals Harmful to Ecosystems

The use of harmful chemicals can pose long-term threats to ecosystems, groundwater, and human populations. SSMI-AD commits to minimizing the use of toxic chemicals in its production, storage, and maintenance processes. Where possible, environmentally safer alternatives will be substituted. All chemicals in use will be assessed for ecological impact, and their handling will follow best practices in safety and containment. We will also train all relevant employees in the safe use and disposal of chemicals, ensuring compliance with environmental regulations and sustainability commitments.

6.10 Destruction of Forests or Wetlands

SSMI-AD strictly prohibits the clearance or destruction of forests and wetlands for industrial purposes unless rehabilitation, restoration, or compensation measures are legally and ethically ensured. We will adhere to national forest conservation laws and international best practices in ecosystem management.

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Our land-use decisions will be informed by biodiversity studies and community consultations. In cases where any unavoidable impact occurs, offsetting programs like reforestation or wetland regeneration will be undertaken in consultation with authorities and environmental NGOs to ensure no net loss of biodiversity.

6.11 Industrial Cumulative Effects

In industrial zones with multiple operators, cumulative impacts on biodiversity can be significant. SSMI-AD will actively collaborate with industry peers, regulatory bodies, and civil society to assess and manage collective ecosystem pressures. We will participate in joint biodiversity conservation programs, pooled environmental monitoring, and regional planning efforts. Our operations will consider the broader ecological context, not just individual impacts. This collective approach reflects our commitment to ecosystem stewardship and supports long-term environmental resilience in industrially active regions.

6.12 Pollution of Local Water Bodies

Water bodies near our operations are often vital for local agriculture, fishing, and domestic use. SSMI-AD commits to preventing pollution and contamination through stringent effluent control, treatment protocols, and continuous monitoring. All operations will comply with national and international water protection standards. We will proactively work with communities, authorities, and third-party auditors to ensure safe water practices. In addition, we will engage in periodic testing of nearby water sources and transparently share findings to build trust and ensure no detrimental impact to community health or ecosystems.


6.13 Impact on Species at Risk

SSMI-AD recognizes the importance of protecting endangered and vulnerable species as part of its biodiversity conservation strategy. Before initiating any project, we will conduct site-level ecological surveys to identify the presence of species listed as threatened or endangered by the IUCN Red List or local conservation agencies. Operations will be planned to avoid disrupting their habitats, migration patterns, or reproductive cycles. We will implement on-ground protective measures, conduct regular monitoring, and engage biodiversity experts to ensure species at risk are safeguarded throughout our operations.

6.14 Land Use Impact on Local Communities

SSMI-AD is committed to ensuring that our operations do not lead to the displacement of, or restrict access to, essential resources such as land, forests, or water for indigenous or rural communities. In alignment with our ESG values, we conduct a Free, Prior, and Informed Consent (FPIC) process before initiating any new site development. This ensures that affected communities are fully informed and given the opportunity to participate in decisions impacting their lives and livelihoods. We respect customary and community land rights and prioritize transparent dialogue, mutual respect, and collaborative planning. By fostering inclusive engagement and maintaining open communication, we aim to build and sustain harmonious relationships with local communities and uphold human rights in all land use matters.

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7. ESG Objectives

1. Sustainability Issue

Objective

Measure

Target Value

: Pollution Exposure Effects

: Reduce pollution impact on biodiversity

: % reduction in pollutant discharge

: ↓ 25%

2. Sustainability Issue

Objective

Measure

Target Value

: Proper Disposal Impact

: Ensure proper waste disposal to protect ecosystems

: % waste properly treated/disposed

: ↑ 100%

3. Sustainability Issue

Objective

Measure

Target Value

: Placement of Local Fauna

: Minimize disruption to local wildlife habitats

: No. of fauna displacement incidents

: ↓ 0

4. Sustainability Issue

Objective

Measure

Target Value

: Neglected Animal Rights

: Protect rights and welfare of animals in operations

: No. of animal welfare assessments conducted

: ↑ 2

5. Sustainability Issue

Objective

Measure

Target Value

: Biodiversity Disclosure Gaps

: Improve transparency on biodiversity impacts

: % completeness in biodiversity reporting

: ↑ 60%

6. Sustainability Issue

Objective

Measure

Target Value

: Environmental Equity Gaps

: Address inequities in environmental impact distribution

: No. of equity impact assessments

: ↑ 1

7. Sustainability Issue

Objective

Measure

Target Value

: Encroachment on Protected Areas

: Prevent operations in protected ecological zones

: No. of encroachment violations

: ↓ 0

8. Sustainability Issue

Objective

Measure

Target Value


: Habitat Destruction Affecting Livelihoods

: Protect habitats supporting local communities

: No. of habitat restoration projects

: ↑ 3

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9. Sustainability Issue : Use of Chemicals Harmful to Ecosystems

Objective : Eliminate or reduce harmful chemical use
Measure : % reduction in hazardous chemical usage
Target Value : ↓ 30%

10. Sustainability Issue : Destruction of Forests or Wetlands

Objective : Prevent deforestation and wetland damage
Measure : Hectares of forest/wetland conserved
Target Value : ↑ 50

11. Sustainability Issue : Industrial Cumulative Effects

Objective : Monitor and mitigate cumulative biodiversity impacts
Measure : No. of cumulative impact assessments
Target Value : ↑ 2

12. Sustainability Issue : Pollution of Local Water Bodies

Objective : Reduce contamination of water sources
Measure : % reduction in water pollutants discharged
Target Value : ↓ 25%

13. Sustainability Issue : Impact on Species at Risk

Objective : Protect vulnerable species in operation areas
Measure : No. of species protection programs
Target Value : ↑ 3

14. Sustainability Issue : Land Use Impact on Local Communities

Objective : Minimize negative effects of land use changes
Measure : No. of community impact assessments
Target Value : ↑ 2

8. Applicable Standards, Laws, Acts

- ISO 14001:2015 – Environmental Management Systems
- Biological Diversity Act, 2002 (India)
- Wildlife Protection Act, 1972 (India)
- Forest (Conservation) Act, 1980 (India)
- UN Convention on Biological Diversity
- Carbon Disclosure Project (CDP)
- Aluminum Stewardship Initiative (ASI)
- UN Global Compact – Principle 7

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- OECD Guidelines for Multinational Enterprises
- Global Reporting Initiative (GRI 304: Biodiversity)

9. Distribution and Annual Review

SSMI-AD's Biodiversity and Animal Welfare Policy is communicated through multiple channels, including the intranet, bulletin boards, onboarding sessions, and regular training, ensuring broad awareness and compliance. Suppliers and contractors receive the policy during onboarding and through contractual obligations, aligning them with SSMI-AD's environmental values. Periodic refreshers and awareness campaigns reinforce its importance across the organization. The Environmental Management Committee reviews the policy annually, with interim assessments triggered by operational changes, legal updates, or new risks. Performance metrics, risk assessments, and stakeholder feedback guide improvements, with updates approved by the ESG Head and widely communicated to uphold responsible environmental stewardship.

10. Disciplinary Action for Policy Violators

SSMI-AD takes violations of its Biodiversity and Animal Welfare Policy seriously, as such actions undermine our environmental and ethical commitments. Employees, contractors, or suppliers found breaching the policy will face proportionate disciplinary measures based on the severity of the violation. These may include verbal or written warnings, suspension, mandatory retraining, termination of employment or contracts, and in severe cases, escalation to appropriate legal authorities. The disciplinary process will follow due procedure, ensuring fairness and confidentiality. Enforcement of this policy underscores our commitment to environmental compliance, accountability, and the protection of natural habitats and animal welfare across all operational areas.

11. Reporting Mechanism

SSMI-AD promotes transparent reporting of biodiversity concerns, habitat destruction, or animal welfare violations by employees, contractors, and stakeholders. Reports can be made via nagaraj@sreesumangala.com, anonymously through our internal portal, or at monthly EHS meetings. All reports are confidentially reviewed by the ESG Committee, ensuring prompt action, accountability, and continuous improvement in our biodiversity and animal protection efforts.

12. Conclusion

SSMI-AD's Biodiversity and Animal Welfare Policy reflects our commitment to ecological responsibility and sustainable growth. We aim to reduce our ecological footprint, protect biodiversity, and promote animal welfare across all operations. By engaging employees, partners, and communities, we integrate conservation into business decisions, recognizing that environmental health is essential to long-term resilience and a greener, more sustainable future.

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32. Employee Dignity Policy

SSMI-AD/ESG/POLICY-32

1. Purpose

SSMI-AD is committed to fostering a safe, respectful, and inclusive workplace by strictly prohibiting all forms of harassment—whether physical, verbal, psychological—or discrimination. We uphold dignity, fairness, and equal opportunity for all employees and stakeholders, ensuring a culture where everyone feels valued, protected, and empowered to contribute without fear of mistreatment or bias.

2. Scope of Application

This policy applies to all SSMI-AD employees (permanent, contractual, temporary), interns, vendors, business visitors, and third parties. It covers all business areas including manufacturing, sales, HR, operations, logistics, and administration. The policy is enforceable across all SSMI-AD premises and locations, both within India and in international operations.

3. Governance

The Board of Directors holds ultimate oversight. The ESG & Ethics Committee monitors trends, incidents, and policy updates. The HR Division and Compliance Officer are responsible for training, complaint handling, and corrective actions. Managers and supervisors ensure daily compliance and timely response within their respective teams and departments.

4. Definition of Terms

✿ Harassment

Harassment refers to any unwanted behavior—verbal, physical, or psychological—that demeans, humiliates, or offends an individual. It creates an intimidating or hostile work environment and undermines dignity, safety, and respect at work. Harassment may be repetitive or a single severe incident, impacting employee well-being and professional performance.

✿ Discrimination

Discrimination involves unfair or unequal treatment of individuals based on characteristics such as gender, race, caste, religion, disability, or sexual orientation. It denies equal opportunity and access to resources or roles. Discrimination undermines workplace equity and violates ethical, legal, and organizational commitments to diversity, inclusion, and human rights.

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✿ Workplace

The term workplace includes all physical office premises, manufacturing sites, and remote or virtual environments. It also covers digital communication tools, company-provided transportation, business travel, off-site training, events, and third-party locations where work is performed. All these settings are subject to the same standards of respectful and inclusive conduct.

✿ Protected Characteristics

Protected characteristics are traits legally shielded from discrimination under Indian law and international conventions. These include gender, caste, race, religion, disability, age, marital status, sexual orientation, gender identity, and pregnancy. SSMI-AD ensures that individuals with such characteristics are treated fairly and with dignity across all employment and engagement levels.

5. Roles & Responsibilities

✿ Employees

All employees, including permanent, temporary, and contractual staff, must uphold respectful behavior, participate in anti-harassment training, and report any incidents of harassment or discrimination they experience or witness. Their active involvement helps build a culture of dignity, safety, and inclusion across all levels of the organization.

✿ Managers/Supervisors

Managers and supervisors are responsible for promoting and enforcing this policy within their teams. They must create an open environment for employees to report issues without fear and escalate reported incidents to HR or Compliance promptly. Their proactive role ensures timely intervention and fosters a respectful workplace culture.

✿ HR

The HR department is accountable for receiving and investigating complaints in a timely, impartial, and confidential manner. They support affected parties, recommend appropriate corrective actions, and document cases for transparency and follow-up. HR also ensures policy awareness through training and communication across the organization.

✿ Compliance Officer

The Compliance Officer tracks all reported incidents, ensures appropriate resolution, and monitors overall adherence to anti-harassment and non-discrimination policies. They compile incident data, identify trends or concerns, and regularly report findings to the ESG Committee for further action and oversight.

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ESG Committee

The ESG Committee oversees policy implementation and reviews it annually to incorporate changes in laws, stakeholder expectations, or internal trends. It addresses systemic or recurring issues identified through reports and investigations and provides progress updates and recommendations to the Board of Directors for accountability and strategic direction.

6. Employee Dignity Policy

6.1 Age-related Harassment

SSMI-AD enforces a culture of fairness and respect across all age groups. Discrimination or harassment due to an employee's age—whether young or senior—is strictly prohibited. We recognize and value the contributions of all employees regardless of age and promote merit-based decisions in recruitment, appraisal, and promotions. Employees are encouraged to speak up against ageist behavior, and age diversity is celebrated in team compositions and leadership development programs. Age-inclusive communication and anti-bias education are embedded in our training framework. Complaints related to ageism are handled with discretion and seriousness, ensuring equal opportunities and treatment for all individuals, regardless of age.

6.2 Adequate Case Monitoring

SSMI-AD enforces structured monitoring of harassment-related risks through internal audits, issue tracking, and continuous improvement mechanisms. Each complaint is classified, anonymized, and analyzed to detect behavioral or systemic trends. Our Anti-Harassment Committee (AHC) conducts quarterly reviews of all cases and reports findings to senior management, who are responsible for implementing corrective actions. These reviews include data on case closure rates, resolution effectiveness, and root cause analysis. By integrating oversight into broader ESG and compliance reviews, we ensure transparency, accountability, and data-driven decision-making to mitigate future risks. Continuous oversight is essential to maintaining workplace integrity and trust at SSMI-AD.

6.3 Leadership Accountability

SSMI-AD places responsibility for anti-harassment compliance squarely on leadership. Managers and supervisors are expected to actively uphold the company's values, intervene early in potential harassment situations, and promote respectful behavior within their teams. Leadership performance reviews incorporate accountability for ESG, diversity, and workplace ethics. Training programs are designed to equip leaders with skills to prevent, detect, and address inappropriate conduct. Failure to fulfill these duties may result in sanctions, including exclusion from promotions or incentive programs. SSMI-AD believes that sustainable change begins at the top and therefore requires all leaders to demonstrate commitment to a harassment-free and ethical culture.

6.4 Harassment via Digital or Virtual Platforms

SSMI-AD extends its zero-tolerance harassment policy to digital workspaces. Online bullying, inappropriate comments, exclusion from virtual collaboration, and hostile emails or messages are strictly prohibited. Communication through emails, messaging platforms, and video calls must align with the same standards as in-person conduct.

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Digital training modules are used to reinforce respectful virtual behavior. Remote workers are equally protected under the policy and may use the same complaint channels for reporting. IT systems are monitored where permissible to detect inappropriate content. Managers are responsible for promoting inclusive digital etiquette. Violations of this policy will result in warnings, digital access restrictions, or further action.

6.5 Retaliation against Complainants

SSMI-AD strictly prohibits any form of retaliation against individuals who report harassment or discrimination in good faith. Retaliatory actions—such as demotion, isolation, threats, or unfair evaluations—are taken seriously and investigated with urgency. Managers are trained to protect complainants and ensure their safety and inclusion during and after investigations. Whistleblower protections are embedded into all reporting channels, and retaliation itself is treated as a separate and punishable offense. SSMI-AD reinforces a culture of trust and transparency where victims and witnesses feel safe speaking up. Protection from retaliation is vital for the success of our ethical and harassment-free workplace commitment.

6.6 Silenced Workplace Concerns

SSMI-AD believes that open communication is key to a respectful work environment. We promote awareness through monthly team dialogues, facilitated by HR and employee groups, along with quarterly town halls where harassment-related concerns can be safely discussed. These sessions normalize conversations about inclusion, respect, and behavioral standards. Managers are encouraged to hold regular team check-ins focused on culture, well-being, and mutual respect. Through structured dialogue, employees are empowered to share concerns, provide input, and participate in shaping a culture of accountability. These initiatives foster mutual understanding, remove reporting stigma, and reinforce our zero-tolerance approach to harassment and discrimination.

6.7 Harassment due to Disability

SSMI-AD ensures that employees with disabilities are treated with dignity and are not subject to any form of harassment, exclusion, or unequal treatment. We provide reasonable accommodations to enable equal participation and performance. Physical, verbal, or systemic mistreatment based on disability is prohibited. The company conducts regular accessibility reviews and promotes awareness through disability inclusion campaigns. Employees are trained on inclusive behavior and language. Complaint redressal is swift, confidential, and sensitive to the needs of affected individuals. We continuously work to remove attitudinal and physical barriers, reinforcing our commitment to building a truly inclusive and accessible work environment.

6.8 Sexual Harassment

SSMI-AD strictly enforces the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act). All employees, irrespective of gender, are protected from sexual harassment through clear policies, awareness campaigns, and confidential reporting systems. We maintain an Internal Committee (IC) to investigate complaints fairly and promptly. Annual training programs ensure that all employees understand acceptable behavior and consequences of violations. SSMI-AD guarantees that complainants are not subject to retaliation and that all cases are documented, monitored, and resolved within the prescribed timelines. A safe and respectful workplace is a core pillar of our ESG values.

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6.9 Harassment Among Temps

At SSMI-AD, contractual and temporary employees are granted the same dignity, respect, and protections as permanent staff. Discrimination, harassment, or exclusion of such workers is unacceptable under our policy. We ensure access to induction training, anti-harassment awareness programs, complaint mechanisms, and internal communication. Contractual workers can report concerns confidentially and without fear of retaliation. Managers are trained to treat all team members equally and are held responsible for any violations. SSMI-AD also audits contractor compliance and includes clauses in contracts requiring equal workplace rights. Fair and respectful treatment of all workers is critical to our ESG commitment and business integrity.

6.10 Harassment of Interns or Trainees

Interns and trainees are integral to SSMI-AD's talent development strategy and are protected under all relevant anti-harassment policies. Our commitment includes offering a supportive and respectful environment for learning and professional growth. Interns and trainees receive clear orientation on behavior expectations and are granted full access to complaint channels and employee welfare resources. Supervisors are trained to provide guidance and ensure that interns are not subject to any form of exploitation or harassment. SSMI-AD also assigns mentors for ongoing support. Breaches of conduct toward interns or trainees are treated as seriously as those involving regular employees, with swift corrective action.

6.11 Harassment of Suppliers' Workers

SSMI-AD is committed to ethical sourcing and expects suppliers to provide a harassment-free work environment to their employees. We include anti-harassment and human rights clauses in our supplier agreements and conduct regular audits and assessments to verify compliance. Suppliers found in violation are required to take corrective action or risk contract termination. SSMI-AD's grievance channels are open to supplier workers who wish to report issues confidentially. We also offer awareness support to high-risk suppliers. Our sustainable procurement practices uphold international labor rights standards, reinforcing the importance of fairness, dignity, and accountability in every tier of our value chain.

6.12 Workplace Respect Deficiency

SSMI-AD recognizes that a respectful and inclusive workplace begins with awareness. To address this, we mandate training for all employees—covering discrimination, harassment, unconscious bias, and workplace behavior. This training is integrated into our onboarding process and refreshed annually. Sessions are role-specific, engaging, and aligned with current legal and ethical standards. Employees learn to recognize, report, and prevent misconduct, thereby strengthening SSMI-AD's inclusive culture. Supervisors receive additional training to respond appropriately to complaints and foster respect in teams. Our goal is to ensure every employee understands their rights and responsibilities in upholding a harassment-free and equitable workplace environment.

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6.13 Adequate Grievance Awareness

SSMI-AD acknowledges that the effectiveness of any anti-harassment program depends on employees knowing how and where to report incidents. We ensure widespread visibility of reporting channels through onboarding sessions, posters, digital communication, and awareness events. Employees are educated on what constitutes harassment, how to file complaints, and what protection they receive after doing so. Anonymous and confidential options are available. HR teams periodically assess awareness levels and update procedures for accessibility and clarity. SSMI-AD encourages a speak-up culture and guarantees no retaliation for whistleblowers. Every employee should feel empowered and informed to take action when workplace misconduct occurs.

6.14 Work Travel Misconduct

SSMI-AD recognizes that business travel and off-site events are extensions of the workplace and enforces its anti-harassment policies during such activities. Conduct expectations are communicated in advance and reinforced through pre-event briefings. Employees are held accountable for their behavior during travel, accommodation, business meetings, and corporate events. Reporting channels remain accessible during off-site engagements, and incidents are investigated with the same seriousness as those occurring on-site. Supervisors are trained to manage group dynamics responsibly. SSMI-AD emphasizes that professional conduct must be maintained at all times, and any breach, regardless of location, may result in disciplinary or legal consequences.

6.15 Verbal Misconduct Incidents

SSMI-AD is committed to eliminating verbal abuse, bullying, and psychological harassment across all workplace settings. We promote a respectful culture where open, non-threatening communication is the norm. Managers and employees are trained on how to identify and prevent emotional abuse and toxic behavior. Anonymous reporting tools are made available to enable prompt intervention. Victims receive support through HR and wellness services. Workplace civility is assessed regularly through culture audits and engagement surveys. We also integrate conflict resolution mechanisms to address disputes early and professionally. All team members are expected to uphold these principles, and violators face disciplinary measures.

6.16 LGBTQ+ Discrimination

SSMI-AD promotes diversity and inclusion by ensuring that LGBTQ+ employees are treated with dignity, fairness, and equality. Discrimination or harassment based on sexual orientation or gender identity is not tolerated in any part of our operations. We are dedicated to fostering an inclusive culture through awareness campaigns, inclusive benefits, and confidential reporting channels. All employees, regardless of their sexual orientation or gender identity, have access to the same opportunities, facilities, and protections. SSMI-AD also monitors workplace culture to eliminate bias, integrates LGBTQ+ support into its grievance redressal, and encourages employees to speak out against any form of discrimination.

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6.17 Sufficient Safeguard Measures

Beyond corrective actions, SSMI-AD takes a proactive approach to eliminate workplace harassment through preventive structures and controls. We have established an Anti-Harassment Committee (AHC) to oversee implementation of safeguards including periodic workplace climate surveys, anonymous feedback channels, and physical audits of the work environment. Preventive practices are embedded in our Occupational Health and Safety Management System to ensure consistency across departments. Visual awareness tools like posters and educational materials are prominently displayed. Our preventive ecosystem encourages early identification of potential risks and demonstrates our commitment to maintaining a safe, respectful, and professional work atmosphere for all employees and stakeholders.

6.18 Cultural Bias Misconduct

SSMI-AD strictly prohibits any form of harassment, bias, or exclusion based on caste, religion, or ethnicity. We maintain a neutral and respectful work environment that values the diverse cultural and social identities of all individuals. Our policy includes regular awareness training, proactive communication on inclusivity, and a zero-tolerance stance on discriminatory behaviors. Employees are encouraged to report any violations, which are swiftly investigated and addressed. We ensure that decision-making is based on merit and that workplace diversity is promoted through fair recruitment and retention practices. Any breach of these principles may lead to disciplinary action, including termination or legal consequences.

6.19 Gender Inequality Incidents

SSMI-AD is committed to maintaining a workplace free from gender-based harassment or discrimination. We uphold the right of every employee, regardless of gender, to fair treatment, dignity, and equal opportunity. Through periodic training, equitable pay structure reviews, and a robust grievance mechanism, we actively prevent gender bias and support affected individuals. All employees are educated on inclusive behavior, while managers are held accountable for promoting gender equity. Our policies apply across all functions and levels within the organization. SSMI-AD also ensures the strict confidentiality of complaints and protection from retaliation to create a safe and respectful work environment for all.

7. ESG Objectives

1. Sustainability Issue

: Age-related Harassment

Objective

: Eliminate age-based discrimination and bias

Measure

: # of age-related complaints reported

Target Value

: ↓ 0

2. Sustainability Issue

: Adequate Case Monitoring

Objective

: Strengthen tracking of harassment cases


Measure

: % of cases monitored until resolution

Target Value

: ↑ 80%


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|--|---|
| <p>3. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Leadership Accountability</p> <p>: Hold management accountable for misconduct response</p> <p>: % of cases reviewed by senior leadership</p> <p>: ↑ 100%</p> |
| <p>4. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Harassment via Digital or Virtual Platforms</p> <p>: Prevent online and remote harassment</p> <p>: # of digital harassment incidents reported</p> <p>: ↓ 0</p> |
| <p>5. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Retaliation against Complainants</p> <p>: Protect individuals who report harassment</p> <p>: # of retaliation cases post-complaint</p> <p>: ↓ 0</p> |
| <p>6. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Silenced Workplace Concerns</p> <p>: Encourage open expression of workplace issues</p> <p>: % increase in reported concerns</p> <p>: ↑ 25%</p> |
| <p>7. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Harassment due to Disability</p> <p>: Ensure respectful treatment of differently-abled persons</p> <p>: # of disability-related harassment cases</p> <p>: ↓ 0</p> |
| <p>8. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Sexual Harassment</p> <p>: Maintain a zero-tolerance approach</p> <p>: # of unresolved sexual harassment cases</p> <p>: ↓ 0</p> |
| <p>9. Sustainability Issue</p> <p>Objective</p> <p>Measure</p> <p>Target Value</p> | <p>: Harassment Among Temps</p> <p>: Provide equal protection to temporary staff</p> <p>: % of temp workers covered under anti-harassment training</p> <p>: ↑ 80%</p> |

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10.Sustainability Issue

: Harassment of Interns or Trainees

Objective

: Safeguard young professionals in training roles

Measure

: % of interns receiving harassment policy orientation

Target Value

: ↑ 90%

11.Sustainability Issue

: Harassment of Suppliers' Workers

Objective

: Extend protections to vendor-associated workers

Measure

: % of supplier workers trained on anti-harassment procedures

Target Value

: ↑ 90%

12.Sustainability Issue

: Workplace Respect Deficiency

Objective

: Foster a culture of dignity and respect

Measure

: % of employees trained in respectful behavior

Target Value

: ↑ 100%

13.Sustainability Issue

: Adequate Grievance Awareness

Objective

: Improve visibility of complaint procedures

Measure

: % of employees aware of reporting channels

Target Value

: ↑ 100%

14.Sustainability Issue

: Work Travel Misconduct

Objective

: Prevent harassment during off-site assignments

Measure

: # of misconduct incidents during work travel

Target Value

: ↓ 0

15.Sustainability Issue

: Verbal Misconduct Incidents

Objective

: Address verbal abuse swiftly and strictly

Measure

: % of verbal misconduct cases resolved

Target Value

: ↑ 100%

16.Sustainability Issue

: LGBTQ+ Discrimination

Objective

: Ensure safe and inclusive environment for all identities

Measure

: # of LGBTQ+ discrimination complaints

Target Value

: ↓ 0

17.Sustainability Issue

: Sufficient Safeguard Measures

Objective

: Strengthen structural protections against harassment

Measure

: % of high-risk areas with preventive systems

Target Value

: ↑ 100%

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18.Sustainability Issue

: Cultural Bias Misconduct

Objective

: Prevent cultural insensitivity or offense

Measure

: # of cultural bias cases reported

Target Value

: ↓ 0

19.Sustainability Issue

: Gender Inequality Incidents

Objective

: Promote gender-equitable treatment

Measure

: % of complaints linked to gender inequality

Target Value

: ↓ 0

8. Applicable Standards & Laws

- SA8000,
- UN Global Compact (Prin. 6),
- OECD Guidelines,
- ILO Conventions, GRI 406.
- POSH Act 2013,
- Constitution of India (Articles 14–18),
- Industrial Employment Act, relevant anti-discrimination provisions.

9. Distribution and Annual Review

SSMI-AD ensures this policy reaches all employees and stakeholders through onboarding packs, the intranet, handbooks, posters, and accessible formats. Annual refresher training reinforces awareness, while ongoing digital communications promote a culture of zero tolerance toward harassment and discrimination. Everyone is made aware of their rights, responsibilities, and reporting mechanisms. The HR Department and ESG Committee jointly review the policy annually or after major incidents, assessing training impact, incident trends, legal changes, and feedback. This continuous improvement process drives updates to the policy, training, or procedures, ensuring alignment with evolving laws and best practices while fostering a respectful, inclusive workplace.

10. Disciplinary Action for Violators

SSMI-AD enforces a strict zero-tolerance approach to confirmed harassment or discrimination. Disciplinary actions range from verbal or written warnings to suspension or termination of employment, based on the severity and nature of the misconduct. Supervisors or managers who fail to report or address violations are also subject to disciplinary measures. For minor infractions, re-training or counseling may be offered as corrective measures. This graded response framework ensures accountability while providing opportunities for behavioral correction. By reinforcing consequences, SSMI-AD maintains a safe and respectful workplace environment and upholds its ESG and ethical principles consistently across all levels of the organization.

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11. Reporting Mechanism

SSMI-AD provides multiple secure and confidential avenues for reporting harassment and discrimination, including reporting to HR, an anonymous hotline, designated internal or third-party email contacts, or direct escalation to the Ethics Committee. All complaints are treated with confidentiality and urgency. Support services are offered to affected individuals, and strict non-retaliation protections are in place. Each report receives acknowledgment within 48 hours, and a formal inquiry is initiated within 7 working days. This mechanism encourages transparent reporting and ensures employees and stakeholders feel safe and supported when raising concerns—essential to a culture of trust, fairness, and accountability.

12. Conclusion

SSMI-AD unequivocally rejects all forms of harassment and discrimination in the workplace. This policy reflects our organizational commitment to promoting respect, fairness, dignity, and inclusivity in every interaction. Rooted in our ESG principles, it ensures all individuals—regardless of role or background—are treated equitably and protected from abuse or bias. By fostering an environment where grievances are addressed promptly and misconduct is not tolerated, SSMI-AD upholds its ethical standards, nurtures employee well-being, and sustains a culture of excellence. This policy is not just a guideline—it is a declaration of the values we live by and expect others to uphold.

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33. Toxic Material Usage Policy

SSMI-AD/ESG/POLICY-33

1. Purpose

This policy affirms SSMI-AD's commitment to managing materials and chemicals responsibly to minimize environmental harm and protect occupational health and safety. It promotes sustainable sourcing, safe handling, secure storage, efficient use, and compliant disposal of all substances used in manufacturing, in alignment with the company's ESG values and regulatory obligations.

2. Scope of Application

This policy applies to all employees, contractors, suppliers, and relevant stakeholders involved in material and chemical management. It covers key business areas such as procurement, production, maintenance, quality control, and waste management. Geographically, the policy is applicable across all SSMI-AD facilities in India and extends to associated logistics and export operations in international markets.

3. Governance

The ESG Committee is responsible for overseeing the implementation, monitoring, and compliance of this policy. Departmental heads are tasked with embedding the policy into daily operations. Internal audits are conducted twice a year to evaluate effectiveness, identify gaps, and ensure continuous improvement in material and chemical management across all SSMI-AD operations.

4. Definitions

☀ Hazardous Materials

Hazardous materials are substances that can cause harm to human health, safety, or the environment due to their chemical, physical, or biological properties. They include flammable, toxic, reactive, or corrosive materials. Proper handling, storage, labeling, and disposal are essential to prevent accidents, occupational exposure, and environmental contamination.

☀ VOC (Volatile Organic Compounds)

VOCs are organic chemicals that easily vaporize at room temperature, often released from paints, solvents, fuels, and industrial materials. They contribute to air pollution and can cause health issues like respiratory irritation or headaches. Monitoring VOC emissions and adopting low-VOC alternatives helps ensure a healthier workplace and cleaner air.

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BAT (Best Available Techniques)

Best Available Techniques (BAT) refer to the most effective and advanced methods, equipment, or practices used to prevent or minimize environmental impact. Defined by regulatory agencies and industry standards, BAT balances environmental protection with economic feasibility, guiding companies like SSMI-AD in selecting optimal solutions for chemical and material management.

5. Roles and Responsibilities

ESG Committee

The ESG Committee is responsible for formulating the Materials and Chemicals ESG Policy, ensuring it aligns with corporate sustainability goals. It conducts periodic reviews, sets performance indicators, and oversees overall compliance. The committee also evaluates risk exposure, monitors improvement actions, and ensures alignment with national and international ESG standards.

EHS Officers

EHS Officers play a key role in enforcing compliance with environmental, health, and safety protocols. They maintain up-to-date chemical inventories, conduct regular site inspections, organize employee training sessions, and monitor hazardous materials handling. They also report non-compliances and assist in emergency preparedness related to chemical spills or exposure incidents.

Procurement

The Procurement team ensures that all sourced materials and chemicals meet environmental and safety compliance standards. They prioritize vendors who provide eco-friendly, low-VOC, or non-hazardous alternatives. Procurement maintains documentation of safety data sheets (SDS), supports supply chain transparency, and works closely with ESG and EHS teams for sustainable sourcing.

Operations

The Operations team is responsible for the safe use, storage, and disposal of materials and chemicals during manufacturing. They implement waste minimization practices, apply emissions control technologies, and ensure equipment maintenance. Their role also includes adhering to chemical handling SOPs and reducing process-related environmental impacts across all production stages.

6. Toxic Material Usage Policy

6.1 Worker Exposure to Hazardous Materials

SSMI-AD prioritizes the health and safety of all workers who may be exposed to hazardous materials. Comprehensive protective measures are enforced, including the provision and proper use of Personal Protective Equipment (PPE), designated chemical handling zones, and local exhaust ventilation systems.

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Employees are regularly trained in safe handling practices, emergency response, and first aid related to chemical exposure. Periodic medical health check-ups are conducted for employees in high-risk roles. Our approach includes continual risk assessments and implementation of engineering controls to reduce exposure levels. All incidents are documented and investigated to ensure continuous improvement in occupational health protection.

6.2 Controlled Substance Training

SSMI-AD mandates regular training for all employees involved in handling hazardous substances. The curriculum includes chemical hazard identification, proper use of MSDS, emergency response protocols, PPE usage, and safe handling techniques. Trainings are tailored based on job roles and updated to reflect regulatory changes or new substances. Refresher sessions and drills reinforce learning and help employees stay current with safety practices. Training outcomes are evaluated through assessments and incident tracking. This initiative ensures that employees are well-prepared to manage chemicals responsibly, minimizing accidents, exposures, and environmental harm, and fostering a safety-first culture across all operational levels.

6.3 Scrap Collection and Material Recovery

SSMI-AD integrates a circular approach to materials management by prioritizing the collection, segregation, and reuse of process scrap, especially non-ferrous metal residues. Our operations emphasize closed-loop recycling systems to maximize resource efficiency and minimize environmental burden. Digital tracking systems are used to monitor material flow and scrap generation in real time. The recovered scrap is reintegrated into production processes wherever technically feasible, reducing dependency on virgin raw materials. This approach not only supports cost savings but also aligns with environmental sustainability goals. Our material recovery initiatives are aligned with national recycling mandates and global circular economy best practices.

6.4 Toxic Pollutant Control

SSMI-AD strictly avoids the use of Persistent Organic Pollutants (POPs) such as polychlorinated biphenyls (PCBs), dioxins, and PAHs in its operations. The company aligns with global frameworks like the Stockholm Convention to eliminate or reduce the release of POPs. This is achieved by selecting alternative substances and modifying thermal processes that could inadvertently generate POPs. Preventive maintenance, temperature control, and emissions filtering are also employed. All materials are screened during procurement to ensure POP compliance. These measures protect ecosystems, reduce long-term health risks, and demonstrate SSMI-AD's proactive role in eliminating substances with global environmental persistence.

6.5 Adoption of Best Available Techniques

At SSMI-AD, the integration of Best Available Techniques (BAT) is a strategic priority to reduce environmental impacts and enhance operational efficiency. BAT includes the use of wet scrubbers, automated dosing systems, sealed reactors, and energy-efficient production equipment. The selection of BAT is based on cost-benefit analysis, regulatory requirements, and ESG performance metrics. Capital planning integrates environmental considerations to ensure that any new investment aligns with pollution control objectives. Employees are trained on the operation and maintenance of BAT systems to ensure long-term effectiveness. SSMI-AD continuously benchmarks its technologies against industry leaders to stay aligned with evolving global sustainability standards.

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6.6 Environmental Incident Response

SSMI-AD maintains a robust environmental emergency response framework to effectively manage chemical spills and accidental releases. This includes onsite deployment of spill kits, containment barriers, and safety gear, along with comprehensive Standard Operating Procedures (SOPs). Designated personnel are trained to respond swiftly and minimize environmental and health risks. Regular emergency drills ensure readiness, and incident debriefings help identify areas for improvement. Preventive maintenance of equipment and chemical storage areas is conducted to reduce emergency risks. The program complies with local regulations and international best practices, ensuring that environmental emergencies are managed with speed, transparency, and minimal impact.

6.7 Air Emissions (VOC, SOx, NOx, Particulate Matter)

SSMI-AD actively monitors and controls air emissions generated from manufacturing processes, particularly Volatile Organic Compounds (VOCs), Sulphur Oxides (SOx), Nitrogen Oxides (NOx), and particulate matter. We utilize sealed furnaces, scrubbers, and vapor recovery systems to capture pollutants at the source. Our equipment and processes are regularly audited to ensure compliance with Central Pollution Control Board (CPCB) standards and international air quality benchmarks. SSMI-AD is committed to continuous improvement by upgrading to Best Available Techniques (BAT) for emission control. Employees involved in operations are trained on emission management practices to reinforce compliance and minimize the environmental impact of airborne pollutants.

6.8 Eco-Friendly Material Sourcing

SSMI-AD promotes circular economy principles by maximizing the use of recovered input materials such as metal scrap, slag, and secondary raw materials. Internal recycling systems are in place to collect, sort, and reprocess valuable inputs from production waste streams. By-products like slag are evaluated for reuse in industrial applications or sold to certified vendors for secondary uses. This approach reduces reliance on virgin materials, minimizes environmental impacts, and supports regulatory compliance. Engineering and production teams are trained to segregate recoverable materials and integrate them safely into the manufacturing process without compromising product quality or operational efficiency.

6.9 Dioxin and Acid Mist Emissions

To mitigate the release of harmful pollutants such as dioxins and acid mist, SSMI-AD employs sealed processing units and automated acid dosing systems in relevant production areas. These technologies prevent uncontrolled emissions and ensure consistent process control. Fume extraction systems are connected to neutralization units to eliminate residual acidic vapors before discharge. Continuous monitoring and maintenance schedules are followed to ensure system efficiency and regulatory compliance. SSMI-AD stays updated with environmental standards and incorporates technological upgrades based on international best practices. These initiatives safeguard both workplace health and external air quality, aligning with our ESG commitment to pollution prevention.

6.10 Green Chemical Alternatives

To reduce environmental and health hazards, SSMI-AD actively evaluates and substitutes highly hazardous substances with safer alternatives. This includes using hydrogen-based reductants, non-toxic solvents, and biodegradable additives wherever technically feasible.

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Substitution efforts prioritize materials with lower toxicity, reduced volatility, and minimal environmental persistence. R&D and procurement teams assess alternatives based on performance, safety data, and regulatory approval. Pilot trials and phased implementation help ensure process compatibility. This transition supports regulatory compliance, improves workplace safety, and reflects SSMI-AD's ESG commitment to minimizing chemical risks in operations and promoting sustainable production technologies.

6.11 Compliance with Chemical Regulations

SSMI-AD ensures strict compliance with all relevant national and international chemical regulations, including REACH (Registration, Evaluation, Authorization and Restriction of Chemicals), Globally Harmonized System (GHS), and applicable Indian environmental and occupational safety laws. We conduct periodic reviews of supplier documentation to verify regulatory adherence and avoid the use of restricted substances. All employees are made aware of regulatory updates through training and internal communications. SSMI-AD also engages in voluntary disclosures through third-party sustainability platforms and audits. Compliance is viewed as a shared responsibility and embedded into procurement, operations, and product development functions to foster a transparent, ethical supply chain.

6.12 Material Use Minimization

SSMI-AD is committed to reducing material consumption through advanced process optimization across all manufacturing stages. By integrating lean manufacturing principles, automation, and real-time data monitoring, we minimize waste and enhance resource efficiency. Our focus includes reducing the use of fossil-based feedstocks, chemical reagents, and other high-impact materials. Continuous improvement initiatives, equipment upgrades, and energy-efficient practices support this objective. Process optimization not only conserves raw materials but also reduces energy intensity and emissions. Employees are trained on efficient production techniques, and departments are encouraged to identify and implement material-saving innovations aligned with our sustainability and cost-reduction goals.

6.13 Chemical Runoff and Water Contamination

SSMI-AD takes proactive measures to prevent chemical runoff and contamination of surface and groundwater sources. Chemical storage and handling areas are equipped with spill containment systems and proper drainage to prevent leaks into the environment. Wastewater treatment plants (WWTP) are installed to ensure that all effluent discharged from operations meets local regulatory standards. Special attention is given to cleaning agents, degreasers, and process chemicals that may contribute to water pollution. Employees are trained in best practices for chemical storage and emergency spill response. Regular monitoring, inspection, and maintenance ensure long-term compliance and protection of water resources from industrial pollutants.

6.14 Chemical Waste Treatment

SSMI-AD ensures that all hazardous substances are safely collected, treated, and disposed of through authorized and environmentally compliant channels. Waste segregation begins at the source, with dedicated storage for different hazardous waste types. Approved vendors manage the collection and disposal, maintaining full traceability and documentation.

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Treatment technologies may include neutralization, stabilization, incineration, or secure landfilling depending on the waste characteristics. Internal audits and vendor evaluations ensure compliance with applicable laws and environmental standards. This approach minimizes environmental liability, ensures worker safety, and aligns with our commitment to responsible waste management and pollution prevention.

6.15 Use of Hazardous and Non-Hazardous Chemicals

SSMI-AD is firmly committed to minimizing environmental and health risks posed by hazardous substances used in its operations. We maintain a comprehensive chemical inventory and ensure each substance is accompanied by an updated Material Safety Data Sheet (MSDS). All containers are appropriately labeled, and employees receive training in chemical safety and handling protocols. Efforts are continually made to substitute hazardous chemicals with safer, environmentally friendly alternatives whenever feasible. Our policy emphasizes the reduction of dependency on hazardous materials through proactive risk assessments and process redesign, thereby supporting both occupational safety and environmental sustainability in alignment with global ESG standards.

6.16 Safe Chemical Logistics

SSMI-AD follows strict procedures for the labeling, storage, handling, and transport of hazardous substances in accordance with international standards such as GHS, OSHA, and REACH. Every container is clearly marked with hazard symbols and handling instructions. Material Safety Data Sheets (MSDS) are available and regularly updated for all chemicals. Storage areas are equipped with ventilation, secondary containment, and segregation protocols. Only trained personnel handle hazardous materials, using appropriate PPE. During transport, materials are accompanied by necessary documentation and secured to prevent leaks or exposure. These practices ensure compliance, reduce risks, and safeguard the health of employees and the environment.


6.17 Biodegradable Material Inputs

SSMI-AD is actively transitioning to eco-friendly and bio-based input materials that offer reduced environmental and health impacts. These materials are selected for their renewability, recyclability, low toxicity, and compatibility with existing production systems. The company prioritizes the replacement of petroleum-based or hazardous substances with greener alternatives that meet or exceed technical performance standards. Procurement teams collaborate with suppliers to source and test these alternatives. Additionally, product development teams are encouraged to explore sustainable formulations. This initiative supports SSMI-AD's long-term sustainability vision, lowers lifecycle emissions, and aligns with customer demand for cleaner, environmentally responsible alloy solutions.

6.18 Waste Generation from Raw Material Processing

SSMI-AD prioritizes waste minimization at the source by optimizing raw material usage and production efficiency. Through advanced planning and precision in raw material handling, the generation of scrap and waste is significantly reduced. Wherever possible, we reuse in-process waste and segregate waste into hazardous and non-hazardous categories. Our waste management practices align with national environmental regulations and global best practices, ensuring safe storage, transport, and disposal. Training is provided to employees on waste handling, and regular audits are conducted to assess performance and identify areas for improvement. We foster a culture of continuous improvement and material stewardship across operations.

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6.19 Safe Substance Management

SSMI-AD implements engineering and operational strategies to minimize the generation and toxicity of hazardous substances during production. This includes upgrading equipment, automating chemical dosing, and redesigning processes to eliminate unnecessary chemical use. Source segregation and in-process controls prevent cross-contamination and enhance recovery. Where hazardous substances are unavoidable, treatment systems are used to neutralize toxicity before discharge or disposal. Process improvements are guided by environmental risk assessments, regulatory requirements, and best practices in industrial hygiene. These efforts enhance safety, reduce regulatory exposure, and support SSMI-AD's broader goal of minimizing the environmental footprint of its metallurgical operations.

7. ESG Objectives

- Sustainability Issue** : **Worker Exposure to Hazardous Materials**
Objective : Reduce employee exposure to harmful substances
Measure : % reduction in exposure incidents
Target Value : ↓ 15%
- Sustainability Issue** : **Controlled Substance Training**
Objective : Ensure all relevant staff are trained
Measure : % of trained employees
Target Value : ↑ 100%
- Sustainability Issue** : **Scrap Collection and Material Recovery**
Objective : Maximize recovery and reuse of materials
Measure : % of scrap materials recovered
Target Value : ↑ 80%
- Sustainability Issue** : **Toxic Pollutant Control**
Objective : Decrease release of toxic pollutants
Measure : % reduction in toxic emissions
Target Value : ↓ 5%
- Sustainability Issue** : **Adoption of Best Available Techniques**
Objective : Integrate industry-leading safety technologies
Measure : % of production lines upgraded
Target Value : ↑ 50%
- Sustainability Issue** : **Environmental Incident Response**
Objective : Strengthen preparedness for chemical incidents
Measure : No. of emergency response drills conducted
Target Value : ↑ 1/year

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7. Sustainability Issue : Air Emissions (VOC, SO_x, NO_x, Particulate Matter)

Objective : Reduce air pollutants from operations
Measure : % reduction in total emissions
Target Value : ↓ 5%

8. Sustainability Issue : Eco-Friendly Material Sourcing

Objective : Increase sourcing of environmentally friendly materials
Measure : % of materials with eco-certification
Target Value : ↑ 40%

9. Sustainability Issue : Dioxin and Acid Mist Emissions

Objective : Minimize release of dioxins and acid mists
Measure : % reduction in emission levels
Target Value : ↓ 35%

10.Sustainability Issue : Green Chemical Alternatives

Objective : Increase use of safer chemical substitutes
Measure : % of chemicals replaced with green alternatives
Target Value : ↑ 30%

11.Sustainability Issue : Compliance with Chemical Regulations

Objective : Achieve full compliance with legal requirements
Measure : % compliance in chemical audits
Target Value : ↑ 100%

12.Sustainability Issue : Material Use Minimization

Objective : Optimize raw material usage
Measure : % reduction in material consumption per unit
Target Value : ↓ 10%


13.Sustainability Issue : Chemical Runoff and Water Contamination

Objective : Prevent contamination of water bodies
Measure : % reduction in chemical runoff
Target Value : ↓ 25%

14.Sustainability Issue : Chemical Waste Treatment

Objective : Ensure all chemical waste is properly treated
Measure : % of chemical waste treated
Target Value : ↑ 100%

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15.Sustainability Issue : Use of Hazardous and Non-Hazardous Chemicals

Objective : Reduce reliance on hazardous substances
Measure : % reduction in hazardous chemical use
Target Value : ↓ 20%

16.Sustainability Issue : Safe Chemical Logistics

Objective : Improve chemical handling and transport safety
Measure : No. of logistics incidents
Target Value : ↓ 0

17.Sustainability Issue : Biodegradable Material Inputs

Objective : Increase use of biodegradable inputs
Measure : % of biodegradable inputs in total material use
Target Value : ↑ 25%

18.Sustainability Issue : Waste Generation from Raw Material Processing

Objective : Minimize waste generated from processing
Measure : % reduction in processing waste
Target Value : ↓ 15%

19.Sustainability Issue : Safe Substance Management

Objective : Ensure safe handling and storage of substances
Measure : % of substances with safety data sheets and controls
Target Value : ↑ 100%

8. Applicable Standards, Laws, Acts

- ISO 14001 – Environmental Management
- REACH (EU) – Regulation on chemicals
- Factories Act, 1948 (India)
- Hazardous and Other Wastes Rules, 2016 (India)
- Aluminum Stewardship Initiative (ASI)
- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- GRI Standards
- Carbon Disclosure Project (CDP)

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9. Distribution and Annual Review

SSMI-AD's Materials and Chemicals Management Policy is communicated organization-wide through digital platforms such as internal portals and email circulars, as well as physical displays on EHS noticeboards and departmental offices. It is included in onboarding programs for new employees and contractors and reinforced through EHS briefings, toolbox talks, and monthly safety meetings. Suppliers receive summarized versions relevant to their roles. The policy undergoes an annual review by the ESG Committee, incorporating input from EHS, Operations, audits, risk assessments, and regulatory updates. Approved revisions are shared with all stakeholders, ensuring the policy remains effective, compliant, and aligned with SSMI-AD's ESG commitments.

10. Disciplinary Action for Violators

SSMI-AD maintains a zero-tolerance approach toward non-compliance with materials and chemical management policies. Any violations—such as unsafe chemical handling, improper storage, or failure to report hazards—will result in proportionate disciplinary measures. These may include retraining mandates, verbal or written warnings, temporary suspension from duties, or termination of employment/contract, depending on the severity and recurrence of the offense. Repeated non-compliance or deliberate violations may lead to legal consequences or regulatory reporting. Contractors and suppliers found violating policy norms will be subject to contract review or discontinuation. All disciplinary actions will be documented and reviewed by the HR and ESG Committee.

11. Reporting Mechanism

SSMI-AD encourages transparent and confidential reporting of any non-compliance, unsafe conditions, or environmental risks related to materials and chemicals management. Employees and stakeholders can report concerns through multiple channels: the internal grievance redressal portal, the whistleblower hotline, designated ESG Committee email addresses, or suggestion drop-boxes located across site facilities. All reports will be treated with confidentiality and investigated promptly by the EHS or ESG Committee, depending on the nature of the issue. Whistleblowers will be protected against retaliation, in accordance with company policy. Regular summaries of issues raised and actions taken will be shared internally for learning and continuous improvement.

12. Conclusion

SSMI-AD is committed to minimizing the environmental and human health risks associated with the use of materials and chemicals in our operations. We integrate ESG best practices, comply with national and international regulations, and continuously improve our systems to ensure safety, sustainability, and circularity across the product lifecycle.

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34. Diversity in Supply Chain Policy

SSMI-AD/ESG/POLICY-34

1. Purpose

The purpose of this policy is to integrate Supplier Diversity into SSMI-AD's Environmental, Social, and Governance (ESG) framework, ensuring that our supply chain practices promote inclusivity, support local economies, and align with international sustainability standards.

2. Scope of Application

This policy applies to all SSMI-AD employees, management, and suppliers engaged in procurement and supply chain activities. It covers manufacturing, procurement, logistics, and distribution of non-ferrous alloy ingots. The policy is applicable across all SSMI-AD operations within India and extends to any international engagements, ensuring consistent adherence to ethical, social, and environmental standards throughout the supply chain.

3. Governance

The ESG Steering Committee, chaired by the Chief Sustainability Officer, is responsible for overseeing the implementation, monitoring, and continuous improvement of this policy. The committee ensures alignment with SSMI-AD's sustainability objectives, evaluates performance against ESG targets, addresses compliance gaps, and provides guidance to management and employees to foster accountability, transparency, and integration of ESG principles across all operations and supply chain activities.

4. Definitions

✿ Supplier Diversity:

SSMI-AD promotes the proactive inclusion of businesses owned by underrepresented groups, such as women, minorities, veterans, and persons with disabilities, within its supply chain. This approach fosters equitable economic opportunities, encourages innovation, and strengthens community engagement, supporting the company's commitment to diversity, inclusion, and social responsibility across procurement activities.

✿ Conflict-Free Sourcing

SSMI-AD ensures that all materials sourced in its operations are free from links to armed conflict or human rights abuses. Suppliers are assessed and monitored for ethical practices, guaranteeing responsible procurement. This approach minimizes reputational and legal risks while supporting global human rights standards, ethical sourcing practices, and sustainable supply chain management.

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Local Supplier

SSMI-AD prioritizes engagement with suppliers located within the same geographical region as its operations. Partnering with local suppliers strengthens community ties, reduces transportation emissions, supports regional economic development, and enhances supply chain resilience. This approach aligns with sustainability objectives, ESG principles, and responsible, environmentally conscious procurement practices.

5. Roles and Responsibilities

Procurement Team:

The Procurement Team is responsible for identifying, evaluating, and engaging diverse and local suppliers. They ensure that sourcing practices align with SSMI-AD's ESG objectives, promote equitable economic opportunities, and integrate supplier diversity and conflict-free sourcing principles into all procurement decisions and supplier relationship management processes.

ESG Team

The ESG Team monitors adherence to the supplier diversity and responsible sourcing policy, tracks performance metrics, and reports progress to management. They provide guidance on ESG compliance, assess supplier risk, and recommend improvements to ensure that procurement practices consistently align with international standards, ethical sourcing principles, and SSMI-AD's sustainability objectives.

Management

Management provides strategic oversight, resources, and support to implement supplier diversity and responsible sourcing initiatives. They ensure accountability, endorse ESG objectives within procurement decisions, and facilitate alignment with global frameworks such as the UN Global Compact and Principles for Responsible Investment (PRI), fostering sustainable, ethical, and inclusive supply chain practices.

6. Diversity in Supply Chain Policy

6.1 Ethical Sourcing Strategy

SSMI-AD is dedicated to fostering an inclusive supply chain by implementing procurement and sourcing practices that provide equal opportunity to all suppliers, regardless of size, ownership, or geographic location. The company's operational processes—including supplier pre-qualification, evaluation, and onboarding—are designed to actively identify, assess, and include diverse suppliers. SSMI-AD ensures transparency in supplier selection, maintains fair and consistent engagement, and regularly monitors supplier participation to confirm adherence to these principles. By embedding inclusivity in sourcing decisions, SSMI-AD promotes a diverse, equitable, and socially responsible supply chain aligned with ESG commitments and international standards.

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6.2 Limited Engagement

SSMI-AD recognizes the strategic value of engaging a wide range of suppliers, including those from underrepresented groups such as women-owned, minority-owned, veteran-owned, and disability-owned businesses. To address the risk of limited engagement, SSMI-AD will actively seek, identify, and onboard diverse suppliers, integrating inclusivity into procurement strategies. The company promotes collaboration, knowledge sharing, and innovation through a diversified supply chain. Procurement teams are trained to consider diversity in supplier selection and evaluation. By fostering equitable opportunities and expanding the supplier base, SSMI-AD strengthens social impact, encourages innovation, and supports sustainable growth across its operations and communities.

6.3 Conflict-Affected Regions

SSMI-AD is committed to responsible sourcing and mitigating the risk of procuring materials linked to armed conflict or human rights abuses. The company sources exclusively from conflict-free smelters and suppliers, adhering to recognized international due diligence standards and ethical sourcing frameworks. Supplier assessments, audits, and certifications ensure transparency and compliance throughout the supply chain. Employees involved in procurement are trained to identify and manage sourcing risks. By prioritizing conflict-free materials, SSMI-AD safeguards human rights, strengthens supply chain integrity, and maintains stakeholder trust while demonstrating adherence to international ethical standards and ESG commitments in all sourcing activities.

6.4 Zero Tolerance Commitment

SSMI-AD requires all suppliers to uphold workplaces that are free from discrimination, harassment, or any form of workplace bias. Suppliers are expected to implement clear anti-discrimination policies, provide ongoing employee training on harassment prevention, and maintain mechanisms to monitor, report, and resolve incidents promptly. Procurement management's performance is linked to suppliers' compliance with these standards, and SSMI-AD conducts periodic audits to ensure adherence. Through these measures, the company actively supports ethical and respectful work environments throughout its supply chain, reinforces human rights standards, and ensures suppliers align with SSMI-AD's ESG objectives and international labor best practices.

6.5 Non-Compliance with national procurement

SSMI-AD ensures full compliance with national procurement laws and regulations to mitigate legal, reputational, and operational risks. The company prioritizes engagement with local suppliers, fostering regional economic development, creating jobs, and supporting community growth. Procurement teams are trained on local regulatory requirements, and internal audits verify adherence to policies. By aligning sourcing strategies with national standards and local priorities, SSMI-AD promotes transparent, responsible, and sustainable supply chain practices. Encouraging participation of local suppliers also enhances supply chain resilience, reduces logistical challenges, and strengthens stakeholder relationships, while ensuring that procurement operations consistently reflect ethical and compliant business practices.

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6.6 Supplier Diversity Efforts

SSMI-AD addresses the risk of insufficient transparency by maintaining open communication and reporting on supplier diversity initiatives. Progress, challenges, and achievements are regularly documented and shared with internal and external stakeholders through reports, meetings, and digital platforms. Stakeholder feedback is actively sought to improve practices and ensure accountability. Transparent reporting builds trust, demonstrates commitment to ESG objectives, and highlights the company's efforts to foster equitable opportunities within the supply chain. By openly sharing information, SSMI-AD strengthens credibility, encourages best practices among partners, and reinforces a culture of inclusivity, ethical behavior, and responsible supplier engagement across all operations.

6.7 Training on Supplier Diversity

To mitigate the risk of insufficient knowledge and awareness, SSMI-AD provides ongoing training programs for employees and suppliers focused on supplier diversity, inclusion, and ethical procurement practices. Training sessions cover policy requirements, practical guidance for implementing diversity initiatives, and the social, economic, and innovation benefits of a diverse supplier base. Participation is encouraged through workshops, e-learning, and interactive modules. Continuous learning ensures that procurement teams and suppliers understand their responsibilities, comply with policies, and actively contribute to diversity objectives. By embedding training into operations, SSMI-AD promotes competency, accountability, and a culture of inclusivity within the supply chain, supporting sustainable and responsible business practices.

7. ESG Objectives

1. Sustainability Issue

: Ethical Sourcing Strategy

Objective

: Ensure sourcing decisions promote diversity and inclusion

Measure

: % of suppliers aligned with ethical sourcing strategy

Target Value

: 90% ↑

2. Sustainability Issue

: Limited Engagement

Objective

: Reduce reliance on a narrow pool of suppliers

Measure

: % increase in active diverse suppliers

Target Value

: 20% ↑

3. Sustainability Issue

: Conflict-Affected Regions

Objective

: Avoid sourcing from conflict-affected or high-risk areas


Measure

: % of suppliers from conflict-free regions

Target Value

: 100% ↑

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4. Sustainability Issue : Zero Tolerance Commitment

Objective : Enforce zero tolerance for discrimination or exclusion in supply chain

Measure : % of suppliers compliant with zero-tolerance policy

Target Value : 100% ↑

5. Sustainability Issue : Non-Compliance with Diversity Policies

Objective : Minimize supplier non-compliance incidents

Measure : % of suppliers non-compliant

Target Value : ≤5% ↓

6. Sustainability Issue : Supplier Diversity Efforts

Objective : Promote inclusion of diverse and local suppliers in procurement

Measure : % of total suppliers from diverse/local backgrounds

Target Value : 20% ↑ □

7. Sustainability Issue : Training on Supplier Diversity

Objective : Build awareness and capability on supplier diversity practices

Measure : No. of suppliers trained

Target Value : 50 ↑

8. Applicable Standards, Laws, and Acts

- International:
- UN Global Compact Principles
- OECD Guidelines for Multinational Enterprises
- Global Reporting Initiative (GRI) Standards
- National (India):
- Public Procurement (Preference to Make in India) Order, 2017
- Companies (Corporate Social Responsibility Policy) Rules, 2014
- National Policy on Skill Development and Entrepreneurship, 2015(UN Global Compact, nipponsteel.com)

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9. Policy Distribution

This policy will be communicated effectively to all relevant stakeholders to ensure awareness and compliance. Internal stakeholders, including employees and management, will receive updates through newsletters, internal bulletins, and training sessions. Suppliers and business partners will be informed via dedicated meetings, workshops, and onboarding programs to reinforce expectations. Additionally, the policy will be accessible publicly through SSMI-AD's website and annual ESG reports, allowing transparency and accountability to external stakeholders. Regular communication ensures that all parties understand their responsibilities, promotes adherence to supplier diversity and responsible sourcing standards, and integrates ESG principles consistently across the organization and its supply chain.

10. Annual Review

The ESG Steering Committee will conduct a formal review of this policy on an annual basis to assess its effectiveness and relevance. The review process includes evaluating compliance trends, identifying gaps in implementation, and aligning the policy with evolving national and international standards, regulations, and best practices. Feedback from employees, suppliers, and other stakeholders will be considered to improve applicability and operational integration. The annual review ensures that the policy remains current, supports continuous improvement, reinforces ESG commitments, and guides decision-making across procurement and supply chain activities, maintaining accountability, transparency, and adherence to SSMI-AD's sustainability objectives.

11. Disciplinary Actions for Policy Violations

Non-compliance with this policy will be addressed through structured disciplinary measures to maintain accountability and integrity. For suppliers, violations may result in reevaluation of contracts, temporary suspension, or termination of the business relationship. For employees, breaches will lead to internal disciplinary actions, which may include warnings, retraining, or other corrective measures depending on severity. The enforcement framework ensures that all stakeholders understand the consequences of non-compliance and promotes adherence to supplier diversity, ethical sourcing, and ESG standards. By implementing clear disciplinary actions, SSMI-AD mitigates risks, maintains trust with partners and communities, and reinforces responsible procurement practices.

12. Reporting Mechanism

SSMI-AD will establish a secure and confidential reporting system for stakeholders to raise concerns related to supplier diversity, ethical sourcing, or policy compliance. The system will allow employees, suppliers, and other partners to report issues anonymously if desired, ensuring protection from retaliation. Reports will be reviewed promptly by the ESG Team, investigated objectively, and addressed through corrective actions or process improvements. Regular monitoring and feedback loops will track reported concerns, identify trends, and strengthen accountability. By providing a transparent, safe, and accessible reporting mechanism, SSMI-AD fosters a culture of integrity, ethical behavior, and compliance across its supply chain and internal operations.

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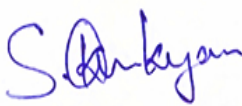
13. Conclusion

SSMI-AD's commitment to integrating Supplier Diversity into our ESG strategy is essential for building a resilient, inclusive, and sustainable supply chain. By addressing identified sustainability risks through targeted policy statements and measurable KPIs, we aim to create long-term value for our stakeholders and contribute positively to the communities we serve.(Reuters, [esg.wistron.com](https://www.esg.wistron.com), DQS Global)

Acknowledgement of Receipt for Policy

I hereby acknowledge that I have received a copy of the Policy. I understand that it is my responsibility to thoroughly read the contents of the Policy and adhere to the policies, rules, and regulations outlined therein.

By signing below, I confirm my commitment to comply with the principles and guidelines stated in the Policy.

Signature : 

Name : S. Karthikeyan

Date : 03rd May, 2025

