

ELEVATE

ESG ROADMAP









ELEVATE

At Alumex PLC, we have embraced ESG practices as the cornerstone of our corporate ethos. Our organisation stands not merely as an enterprise, but as a beacon of progress, kindling a blazing flame of positive transformation in our community.

Our commitment to eco-consciousness is at the heart of our corporate journey, elevating our environmental stewardship, fostering our social cohesion, and strengthening our governance to establish a profound connection between us and our stakeholders.

At its heart, "Elevate" symbolises our commitment to lead with purpose in ESG practices. This roadmap is not just a strategy; it is a call to action to create lasting, positive change for our stakeholders, communities, and the planet.

Content



About this Document



08

Chairman's Message



10

Message from Managing Director

- 06 About this Document
- 08 Chairman's Message
- 10 Message from Managing Director
- 12 Message from Head of Sustainability
- 14 Our Company
- 18 ESG Integration
- 20 Responsible Stewardship
- 25 Elevating the Health of the Planet
- 28 Elevating our Product Proposition
- 30 Elevating our Human Capital
- 33 Elevating our Partnerships and Collaborations
- 36 Environmental Policies
- 41 Social Policies
- 68 Governance Policies
- 76 Annexure 1: Risk Inventory
- 77 Annexure 2: Risk Register





The future demands bold action and Elevate sets the stage for Alumex to strategically embed environmental consciousness across its value chain and operations to ensure sustainable and resilient growth

About this Document



Elevate serves as Alumex's holistic ESG Roadmap, clearly defining the material ESG topics, 2030 targets and action plans in place to reach our ambitions



'Elevate' represents the codification of Alumex PLC's (herein referred to as 'Alumex' or 'the Company') environmental, social and governance (ESG) commitments, as we seek to make these aspirations fundamental to our business. The document (herein referred to as the 'ESG Roadmap') serves as Alumex's holistic ESG Roadmap, clearly defining the material ESG topics, 2030 targets and action plans in place to reach our ambitions. Elevate is aligned to the ESG Roadmap of our parent entity, the Hayleys Lifecode, the United Nations' Sustainable Development Goals (SDG) and industry-specific global guidelines.

This document is the property of Alumex and should not be reproduced in part or whole without the explicit consent of the Company. This is the first edition of the document and will be reviewed and updated every two years to reflect development in related areas or more frequently if deemed necessary.

Scope and boundary

The ESG Roadmap is applicable to all Alumex's operating locations. The scope and ambition of the Roadmap also applies to partnerships along the value chain, which includes suppliers, fabricators and other business partners. Alumex's ESG Division will maintain a list of all operational locations and ensure that these locations report progress regularly. The scope of financial and ESG reporting are consistent, thereby minimising the risks of unidentified and unassessed risks to the Company.

New locations and businesses: In ensuring consistency in reporting boundaries between financial and ESG reporting, new locations and businesses will be onboarded to the Hayleys Group's

Sustainability Information system and comply with ESG reporting requirements during the first year of commencement of operations.

Standards and frameworks

The ESG Roadmap is designed to comply with the requirements of the following voluntarily adopted standards, frameworks and codes.

- SLFRS S1 and S2 Sustainability Reporting Standards
- Performance Standards of the Aluminium Stewardship Initiative (ASI)
- Integrated Reporting Framework issued by the International Integrated Reporting Council
- GRI Standards issued by the Global Reporting Initiative
- Code of Best Practice on Corporate Governance issued by CA Sri Lanka 2023
- Guidelines issued by the Sustainability Accounting Standards Board (SASB)
- Recommendations of the Task Force on Climate Related Disclosures (TCFD)

Public disclosure and communication

Progress will be communicated to key stakeholders through Alumex's Annual Integrated Report which is published in June every year and complies with the requirements of the GRI Standards and other international sustainability reporting frameworks. The Company's ESG performance will also be updated regularly on its corporate website.

Review and update

This is the First Edition of this document and should be reviewed and updated at least biennially to reflect developments in related areas or more frequently if deemed necessary by the Group Management Committee.

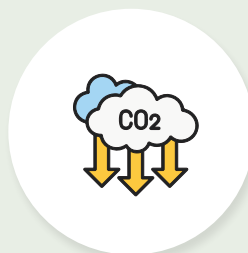
How to read this document

This document articulates the Company's commitment to embedding ESG aspirations across its processes, strategy and decision-making. It includes detailed disclosures on the Company's approach to identifying and managing its material ESG topics, long-term ESG aspirations and the action plan to achieve these goals. The relevant Environmental and Social policies are annexed herewith and publicly disclosed on the Company's website.

▶ This document can also be viewed online at www.hayleys.com



Targets for 2030



25%

reduction

GHG emission intensity



30%

reduction

Water intensity



50%

increase

CSR beneficiaries



50%

Social and environmental screening of suppliers



Chairman's Message



I am also a firm believer that a strategic approach towards ESG contributes towards improved shareholder returns in the longer-term, and I am confident that the effective implementation of Elevate can build a more competitive, resilient and accountable business in years to come



A handwritten signature in black ink, appearing to read 'M. Pandithage'.

Mohan Pandithage
Chairman

I am delighted to present this message on the launch of 'Elevate' - Alumex PLC's comprehensive ESG Roadmap, which seeks to embed environmental, social and governance consciousness in a strategic and holistic manner.

Aligned with Hayleys PLC's ESG aspirations, this roadmap serves as a strategic blueprint in driving the Company's transformation to an industry leader in sustainability while accelerating progress towards a greener and more equitable future. I am also a firm believer that a strategic approach to ESG contributes towards improved shareholder returns in the longer-term, and I am confident that the effective implementation of Elevate can build a more competitive, resilient and accountable business in years to come.

The climate crisis is leaving a trail of disaster and destruction across the globe and the space in which to address it is narrowing rapidly. Climate change is the defining challenge of this generation and unless governments, businesses and individuals unite to redefine the way we interact with nature, the future of generations to come will be compromised. Given the systemic nature of climate-related risks, the implications on businesses are diverse and complex, leading to rapidly shifting risk landscapes and evolving stakeholder demands. Against this backdrop, I applaud the Alumex Team for embarking on this ambitious and inspiring journey, and I invite each and every employee to fulfill their individual responsibility in addressing this critical global challenge.

At Hayleys, sustainability has always been an integral part of who we are, defining how we do business and how we interact with the external world. The codification of this commitment through the launch of the Hayleys Lifecode in 2022, marked a step change in the Group's ESG journey, setting the wheels in motion to rewire our business models, drive inclusive value creation and contribute towards the low-carbon transition. Implementation of the Hayleys Lifecode has entailed a Group-wide strengthening of sustainability governance, reporting and assurance processes, nurturing sustainability-consciousness across the entire Group.

I take this opportunity to congratulate the Board of Directors of Alumex PLC, the leadership team and all employees for their commitment, passion and determination in charting this course and wish them all success. I am certain 'Elevate' will emerge as a defining feature of the Company's future, aptly positioning it as a more resilient, sustainable and stable organisation.

Thank you.



Mohan Pandithage
Chairman

Message from Managing Director



As a key input in other goods that help reduce emissions, such as energy-efficient buildings and electric vehicles, decarbonising aluminium can play a critical role in driving global climate efforts, underscoring the vital importance of deep industry decarbonisation.



A handwritten signature in black ink, appearing to read 'Pramuk Dediwela'.

Pramuk Dediwela
Managing Director- Alumex PLC

I am delighted to share this message at the launch of 'Elevate', Alumex PLC's ESG Roadmap, which codifies our commitment to a circular economy, embedding responsible business practices across all aspects of our operations. Centering on the key pillars of environment, product proposition, human capital and partnerships, the roadmap clearly defines the Company's environmental, social and governance aspirations for 2030, together with annual targets, action plans and strategies to achieve these objectives. Elevate is broadly aligned to the Hayleys Group's ESG Framework, the 'Hayleys Lifecode' and designed to address the unique sensitivities of our industry.

Aluminium is amongst the world's most abundant and sought-after metals for industrial transformation to support in elevating the life of global population. As a critical input in high-demand goods that contribute to emission reductions—such as energy-efficient buildings and electric vehicles—decarbonising aluminium is essential for advancing global climate protection efforts. This underscores the urgent need for deep decarbonisation within the industry.

In this context, Alumex proudly aligns with the International Aluminium Institute's 1.5°C Scenario, rooted in the International Energy Agency's Net-Zero by 2050 roadmap. Additionally, the aspirations of our 'Elevate' initiative are closely aligned with the Aluminium Stewardship Initiative (ASI), which strives to foster a more transparent, sustainable, and ethical global aluminium value chain through responsible social and environmental practices.

I firmly believe that strategically integrating ESG principles into the Company's core strategy is crucial for success. This approach ensures compliance,

conformity, and consistency across our product offerings, operations, and decision-making processes—foundations essential for sustainable growth and strong financial performance. As global operating landscapes evolve rapidly, environmental and social risks are becoming increasingly prominent in risk assessments, underscoring the importance of embedding ESG at the heart of our business.

Proactive identification, measurement and mitigation of such risks can strengthen business resilience, contributing to long-term equitable value creation across our universe of stakeholders.

In line with the standards and guidelines set by Hayleys PLC, Alumex has strengthened its governance structures, policy frameworks, and monitoring mechanisms for managing ESG compliance. Accordingly, an ESG Steering Committee has been established at the Executive Leadership level, with Board representation, ensuring that ESG compliance is escalated to the Board when required.

I would like to take this opportunity to extend my appreciation to the Company's ESG team, which has worked tirelessly to formulate and roll out this action plan across the organisation. I also invite both our internal and external stakeholders to join us as we embark on this ambitious journey to 'Elevate' our future.



Pramuk Dediwela
Managing Director- Alumex PLC

Message from Head of Sustainability



The implementation of Elevate follows a systematic process, which includes strengthening governance and reporting structures, policy frameworks, data collection mechanisms and roll out of organisation-wide processes and initiatives among others



A handwritten signature in black ink, appearing to read 'Dilhan Jayawardena', positioned above the name and title.

Dilhan Jayawardena
General Manager -
Supply chain management

I am delighted to present this message on the launch of our ESG Roadmap 'Elevate', which will guide us through the next crucial steps on our journey to creating a more sustainable future- one that values environmental stewardship, social responsibility, ethical business practices and shared value creation. Elevate codifies the Company's commitment to triple bottom line value creation as we seek to decouple business growth from adverse environmental and social impacts. It is grounded in the understanding that ESG is not just an isolated strategy, but a shared responsibility which requires collective responsibility and organisation-wide commitment.

The implementation of Elevate follows a systematic process, which includes strengthening governance and reporting structures, policy frameworks, data collection mechanisms and roll out of organisation-wide processes and initiatives among others. Elevate is structured on four key pillars which reflect the Company's most material environmental and social topics- both from a financial and impact materiality perspective.

Our environmental agenda is articulated through the 'Elevating the health of our planet' pillar which sets ambitious targets to reduce the Company's emission intensity, preserve water and enrich biodiversity. In achieving its climate action targets the Company intends to increase reliance on renewable energy, improve energy efficiency across operations and implement energy management systems.

The Product Proposition pillar aims to embed sustainability thinking across the entire product life cycle through increasing resource efficiency, optimising input

materials and minimising the generation of waste. Action plans centre on increasing reliance on recycled Aluminium through widening the network of scrap collection points, reducing ash and sludge generated and optimising water consumption other others. The third pillar of Elevate centres on enhancing the Company's human capital through nurturing an engaged team within a diverse, inclusive and safe culture. Targets and action plans have been defined for improving employee satisfaction and retention, reducing work-place related injuries and upskilling employees among others. The fourth pillar, Elevating Partnerships aims to leverage the Company's stakeholders in advancing sustainability aspirations through focusing on the key areas of preserving human rights, customer relationships, responsible sourcing and community value creation.

I am excited about the road ahead for Alumex as we embark on this challenging and ambitious journey. Each of us have a role to play and I encourage every single person of the Alumex family to engage, ask questions, challenge the norms and contribute to our ESG aspirations.

Looking forward



Dilhan Jayawardena

General Manager -
Supply chain management

Our Company

Alumex is Sri Lanka's leading manufacturer and exporter of aluminium extrusions, offering an array of commercial, industrial, residential and architectural solutions. Commanding an estimated market share of 46%, the Company's competitive edge has been sharpened by its superior product capabilities enabled by state-of-the-art manufacturing infrastructure, unmatched reputation for quality and mutually-beneficial relationships across its value chain. The Company is also a catalyst for skill development along Sri Lanka's aluminium value chain, investing in capacity building to diverse industry stakeholders including fabricators, dealers, engineers and students. Alumex is a subsidiary of Hayleys PLC, Sri Lanka's largest and most diversified conglomerate.



Purpose

Together, we elevate living through sustainable and innovative Aluminium solutions



Vision

To be the premier Aluminium extrusion manufacturer in the South Asian Region.

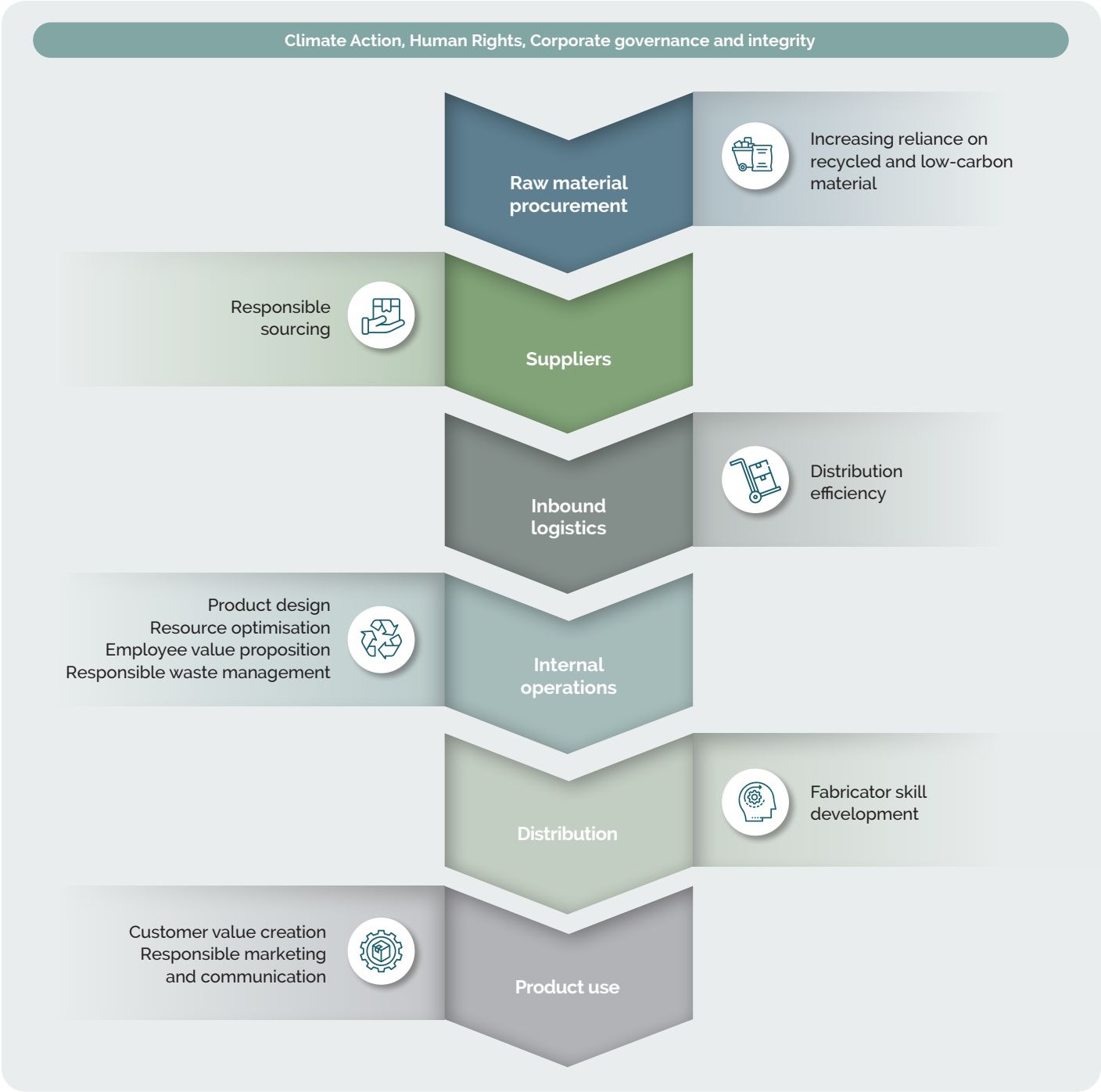


Mission

We will create customer intimacy with innovative Aluminium solutions through world-class, sustainable manufacturing practices

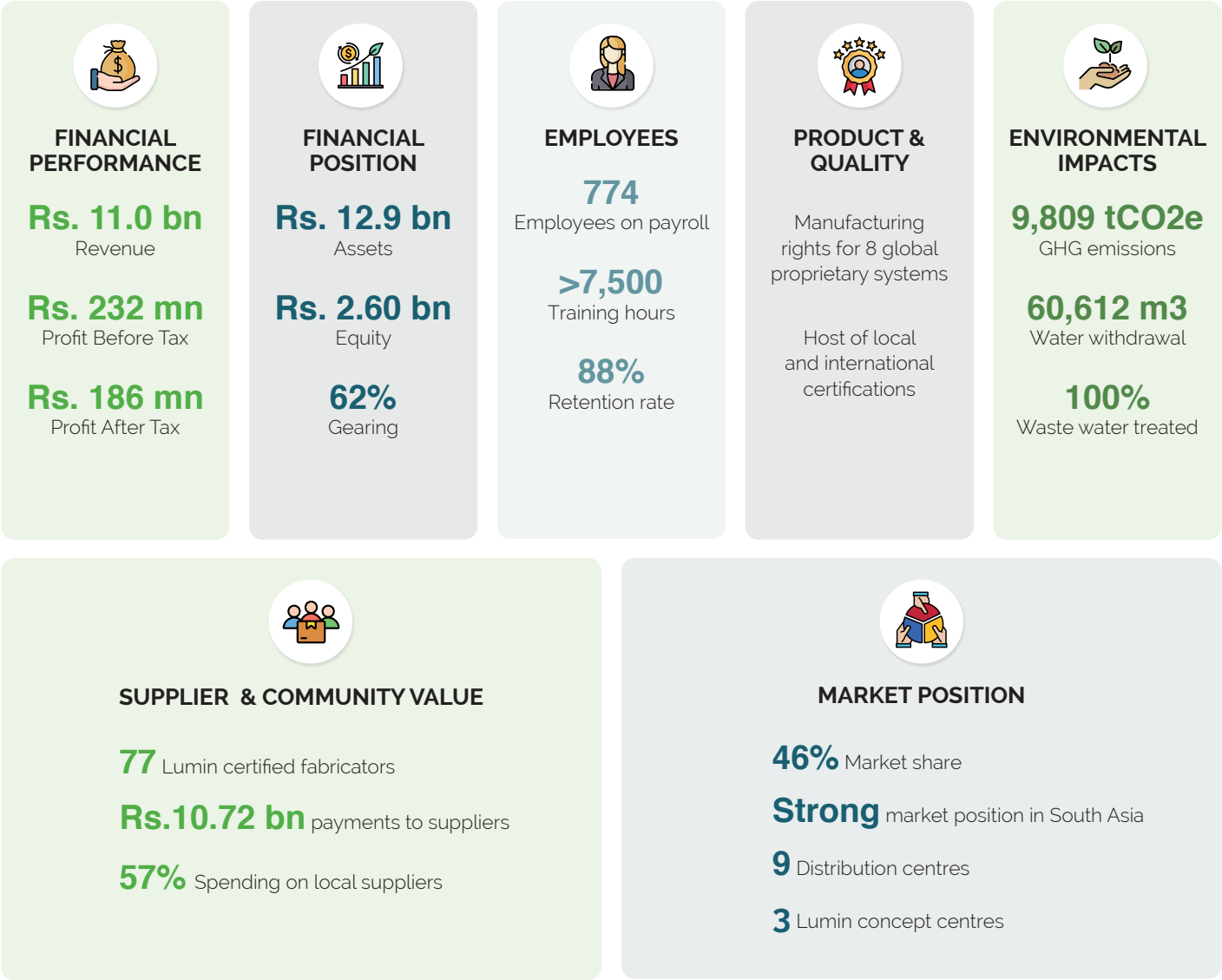


Sustainability issues/impacts along our Value Chain



Our Company

Alumex in Numbers 2023/24





Our social aspirations centre on fostering equitable, inclusive, and resilient partnerships and communities. In our industry, this means prioritising the health, safety, and well-being of our workforce while propagating sustainable practices across our value chain and communities impacted by our operations.

ESG Integration

Approach to ESG

The Company's approach to ESG is broadly aligned to that of its parent, encompassing integration to governance, risk management, strategy and reporting mechanisms as graphically illustrated below. In line with Group-wide governance and reporting requirements, Alumex has also established dedicated committees and defined specific reporting lines, ensuring relevant information is tracked, monitored and reported on an ongoing basis.



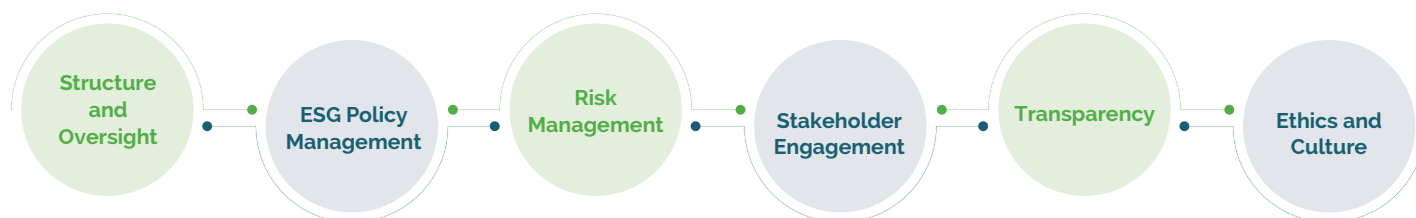
The Hayleys Lifecode

The Hayleys Lifecode was launched in January 2022 and articulates the Hayleys Group's social and environmental aspirations and sustainability roadmap for 2030. The Lifecode and its related social, environmental and governance policies are applicable as a minimum standard across all Group companies; however, Sectors are encouraged to develop their own ESG Roadmaps taking into consideration industry-specific dynamics, specific opportunities and risks and their business model. Sector goals and aspirations should be aligned to the Group goals set out by the Hayleys Lifecode while clear governance structures and reporting lines have been defined to ensure Sector-level progress is reported to Hayleys PLC and monitored on a timely basis.

The 'Elevate' Framework



Responsible Stewardship

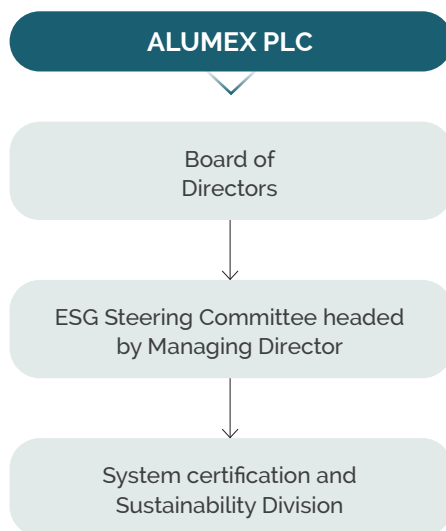


Structure and Oversight

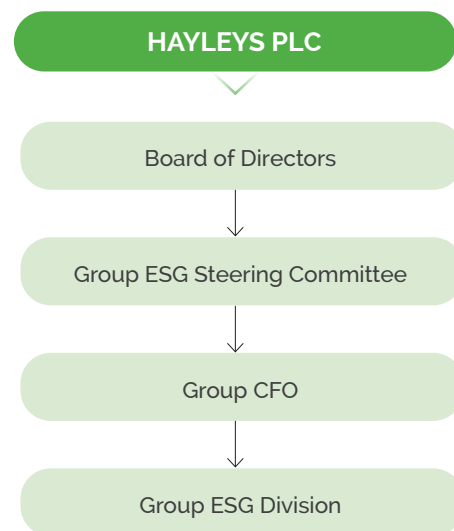
The Company adopts a top-down approach to facilitate ESG integration across all aspects of its operations. The Board of Directors is ultimately responsible for overseeing the implementation of the ESG Roadmap and ensures that Alumex's ESG aspirations are integrated with the Company's business strategy and decision-making. The Company has also established an ESG Steering Committee to drive the ESG Roadmap and implement required initiatives and decisions. The ESG Steering Committee is headed by the Managing Director and is represented by the Finance Director and Members of the Group Management Committee.

ESG Steering Committee

- a. Provide oversight and monitor the execution of the Company's ESG Framework 'Elevate' including progress against environmental, social and governance targets in the short, medium and long-term.
- b. Identify ESG related risks, opportunities and impacts and recommend the implementation of appropriate measures to effectively address these dynamics.



- c. Review and provide guidance on ESG related policies and programmes required to drive the ESG Framework and strategy.
- d. Review and approve the Company's stakeholder engagement strategy which allows management to identify, understand and respond to stakeholders' legitimate concerns.
- e. Receive updates at least quarterly or as and when required, on ESG matters



- f. Review, approve and make recommendations in respect of sustainability and ESG factors in the Company's corporate reporting and external communications.
- g. Review emerging trends and issues in the ESG areas and assess potential impact on the Company including progress against targets, key KPIs and strategy implementation.

In addition to the ESG Steering Committee, three working committees have also been formed to effectively drive the environmental, social and governance pillars. These working committees are represented by the relevant functional heads and individuals with expertise in the relevant areas.

System certification and Sustainability Division

The Company's System Certification and Sustainability Department and holds operational responsibility for driving the Elevate Framework. The Division leads the implementation of ESG initiatives while providing the relevant qualitative and quantitative information for monitoring, providing feedback to the leadership on ESG performance, and identifying potential sustainability related risks and opportunities among others.

Oversight from Hayleys PLC

Sector-level progress on ESG initiatives are reported to Hayleys PLC and monitored on a timely basis. The Head of the Alumex ESG division also acts as the Sector representative for Hayleys and works closely with the Hayleys Group ESG division in aligning with Hayleys Lifecode, reporting progress and driving any Hayleys Group ESG initiatives. The Hayleys Group ESG Steering Committee is discharged with providing oversight with respect to the Group's ESG framework, strategy, policies, risks and opportunities, initiatives and external commitments. The Committee consists of 3 Executive Directors of Hayleys PLC and 3 members of the Group Management Committee (GMC) including the Group Chief Financial Officer (GCFO) and Head-Group Human Resources and Legal. The Committee receives updates at least quarterly on pertinent ESG matters

across the Group including sector-level progress against targets, key KPIs and strategy implementation.

ESG Policy Management

The Hayleys Group's ESG policies apply as a minimum standard for all entities within the Group, with Sectors/entities which have more stringent requirements encouraged to formulate their own policies reflecting industry specific dynamics. Policies are reviewed at least biennially or when significant changes occur in the relevant environmental, social and governance factors requiring a revision of the policy. A summary of the Company's ESG policies are available on the corporate website, accessible at www.alumexgroup.com. Employees are regularly updated on the Company's policies through policy refreshers that happen at least on once in two years.

Environment		Social	Governance
- Material and waste management policy* - Energy and emissions management policy - Water management policy - Biodiversity conservation policy	Human Capital	- Industrial Relations policy - Disciplinary policy - Grievance handling policy - Recruitment policy - Rewards and Remuneration policy - Learning & Development policy - Talent Management and Succession Planning policy - Performance Management Policy - Human Rights Policy - Policy on Whistleblowing - Anti-Sexual Harassment policy - Health and Safety Policy	- Policy on Matters Relating to the Board of Directors - Policy on Board Committees - Policy on Corporate Governance - The Hayleys Way - Stakeholder Engagement - Policy on Corporate Disclosure - IT policy - Policy on Risk Management and Internal Controls - Policy on Control and Management of Assets - Intellectual Capital Policy - Bribery and Anti-Corruption Policy
	Social & Relationship Capital	- Customer Management Policy - Procurement Policy* - Community Relationship Policy	

*Industry-specific policies developed for Alumex PLC

Responsible Stewardship

Environmental and Social management systems

The Company has obtained the following certifications, which form the foundation of the environmental and social management systems in place to manage specific impacts as listed below:

Material area	Certification/ Management system
Environmental Management	ISO 14001: 2015
GHG Emission Quantification	ISO 14064-1 (2018)
Occupational Health and Safety	ISO 45001: 2018
Quality Management	ISO 9001: 2015

Risk Management

A structured mechanism is in place for the identification and assessment of ESG-related risks and opportunities as detailed below.

Roles and responsibilities: The Board of Directors hold apex responsibility for managing the Company's risks in an effective manner. The Board's risk-related duties have been delegated to the Audit Committee and ESG Steering Committee; the latter is responsible for the management of sustainability and climate-related risks and opportunities including formulating response strategies. Quarterly ESG risk assessments are tabled at the Audit Committee meetings, ensuring that the relevant risks are escalated to the Board

Risk identification: Standardised ESG risk inventories and registers are in place for the quarterly assessment of ESG risks and opportunities (Refer to page 76 and 77 for Risk Inventory and Risk Register)

Data inputs: An array of operational data and non-financial performance indicators (based on reporting frameworks) are monitored on a monthly basis

Environmental and Social Impact Assessments

The Company has implemented a structured process to identify, evaluate, prevent and mitigate the environmental, social and other relevant impacts of major projects. The Company's Environmental and Social Impact Assessment process is based on the guidelines issued by the International Association for Impact Assessment and includes the following key steps.

Materiality

The Sector's materiality determination process is aligned to the Group-wide materiality assessment guidelines set out by Hayleys PLC, which are applicable across the Group. The Sector's ESG Committee has oversight responsibility for ensuring that the materiality assessment is carried out appropriately and diligently, in line with the guidelines set out by the Group Materiality Assessment Policy.

Methodology

The Group adopts a double materiality lens in determining material topics considering the impact on the organisation as well as on economic, social and environmental impacts. The process adopted for assessing material issues is presented below:

Establish process parameters

A list of possible material issues has been selected as process parameters and a reference point in conducting the materiality assessment. These are determined by the Group ESG Division based on,

- 1- Discussions with Sector leadership teams
- 2- Evaluation of the Group's business model and strategic aspirations
- 3- Guidelines recommended by local and international corporate reporting frameworks including the IFRS S1 and S2 standards, IR Framework, SASB Standards and GRI Standards

Sector level prioritisation of material topics

The issues are prioritised at Sector level using the following filters to assess the relative importance of the topics to stakeholders and the importance to the organisation.

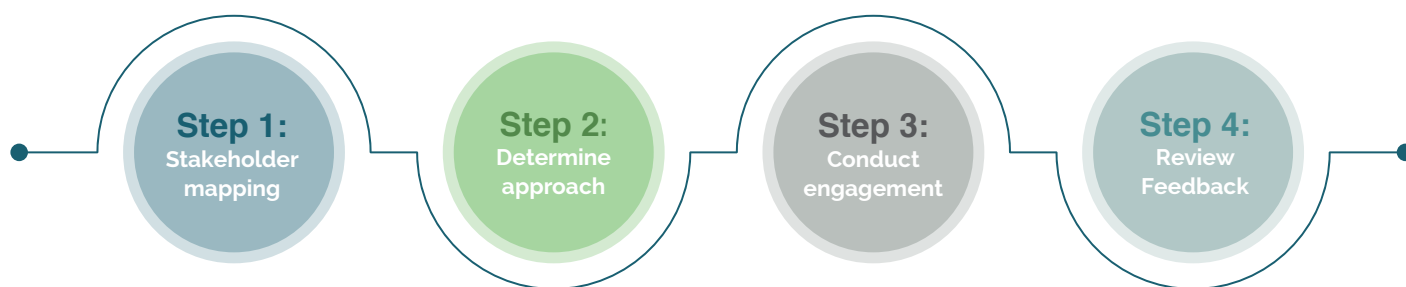
Filtering tests

Organisational materiality	Impact materiality
Financial impact	Stakeholder impact
Innovation opportunity	Customers
Reputation	Employees
Externalities	Shareholders
Strategic link	Suppliers
Risk	Business Partners
	Government
	Communities
	Environmental impact

Stakeholder Engagement

Effective stakeholder engagement ensures that the perspectives and needs of all relevant parties, including investors, employees, communities, customers, and regulators, are considered in the Company's decision-making processes. In Alumex, stakeholder feedback is a key to creating sustainable business practices that meet the demands of both internal and external stakeholders.

Approach to stakeholder engagement



Stakeholder mapping

In the identification stage, all parties who currently have an interest in the Group's business or are likely to have an interest in the future should be considered (list set out alongside). Prioritise and select stakeholders to engage with based on the criteria set out below. The selected stakeholders do not remain static over time but evolve with changes in the internal and external operating environments.

- **Influence:** The level of influence the stakeholder has over the organisation directly or through other stakeholders
- **Vulnerability:** The degree to which the stakeholder will be impacted by the Group's activities
- **Expertise:** The expertise, level of information and guidance that can be given by the stakeholder
- **Orientation:** The nature of the relationship (i.e collaborative or combative)

Grievance mechanisms

The Company has established formal stakeholder grievance and complaint handling mechanisms for all key stakeholder groups. Communication channels and follow-up mechanisms are clearly documented, enabling the Company to identify and mitigate potential risks and improve stakeholder relationships and Continued efforts are made to ensure that grievance mechanisms are accessible, equitable and transparent. The grievance mechanisms are reviewed biennially and/or when there are significant shifts in environmental, social and governance risk factors.

Stakeholder group	Details of grievance mechanisms	Point of contact
Employees	- Grievance Handling Policy for employees - Clearly defined complaints mechanism which allows employees to present their grievances while maintaining confidentiality and anonymity	Immediate Supervisor/ Department Head/ GMC member
Customers	Customer Complaints Handling Procedure	Relevant Customer Service Manager
Communities	Community Grievance Mechanism which is publicly communicated via the Company's website and displayed near the Company premises	Head of HR
Minority shareholders/ Investors	Direct communication channel to the Company Secretary	Company Secretary

Responsible Stewardship

Transparency

The Board of Hayleys PLC is committed to facilitating transparency and accurate reporting to its investors and other market participants.

Financial and operating results

Quarterly financial statements and the Annual Report serve as regular communication of our financial performance which is disseminated through the Colombo Stock Exchange. Material developments that arise between these reporting dates are announced through the Colombo Stock Exchange to facilitate equal access to information by investors and market participants. Additionally, we also issue press releases on our quarterly financial performance and material developments that arise in the interim period to facilitate timely dissemination of information.

Sustainability and ESG Reporting

Alumex publishes an Integrated Annual Report which is prepared in line with the following reporting frameworks. The Company's Annual Report is available for public download on the its website, www.alumexgroup.com

- <IR> Framework of the International Integrating Reporting Council
- Global Reporting Standards (GRI) for Sustainability Reporting
- IFRS S1 and S2 Sustainability Disclosure Standards

Ethics and Culture

Compliance

Heads of Departments are responsible for ensuring compliance with relevant legislations, regulations, permit and license requirements as well as statutory and other reporting obligations. The

Systems Certification and Sustainability Department maintains a Compliance Register detailing the level of compliance of each Department. Exposure to compliance risk is assessed through the Company's Internal Audit function, during the Annual Internal Audit conducted by the Hayleys PLC Internal Audit division and a range of external audits relating to the Company's certifications. Mechanisms are also in place to seek legal counsel from the Hayleys PLC Legal Team and/or external parties when required.

Anti-Corruption

Policy: The Hayleys Group's Bribery and Anti-Corruption Policy (which is applicable to all entities with the Group) commits to a zero-tolerance approach for bribery and corruption. The Policy defines the Group's approach for gifts, hospitality and other promotional expenses, facilitating payments, political contributions and donations to politically connected persons and commission payments among others.

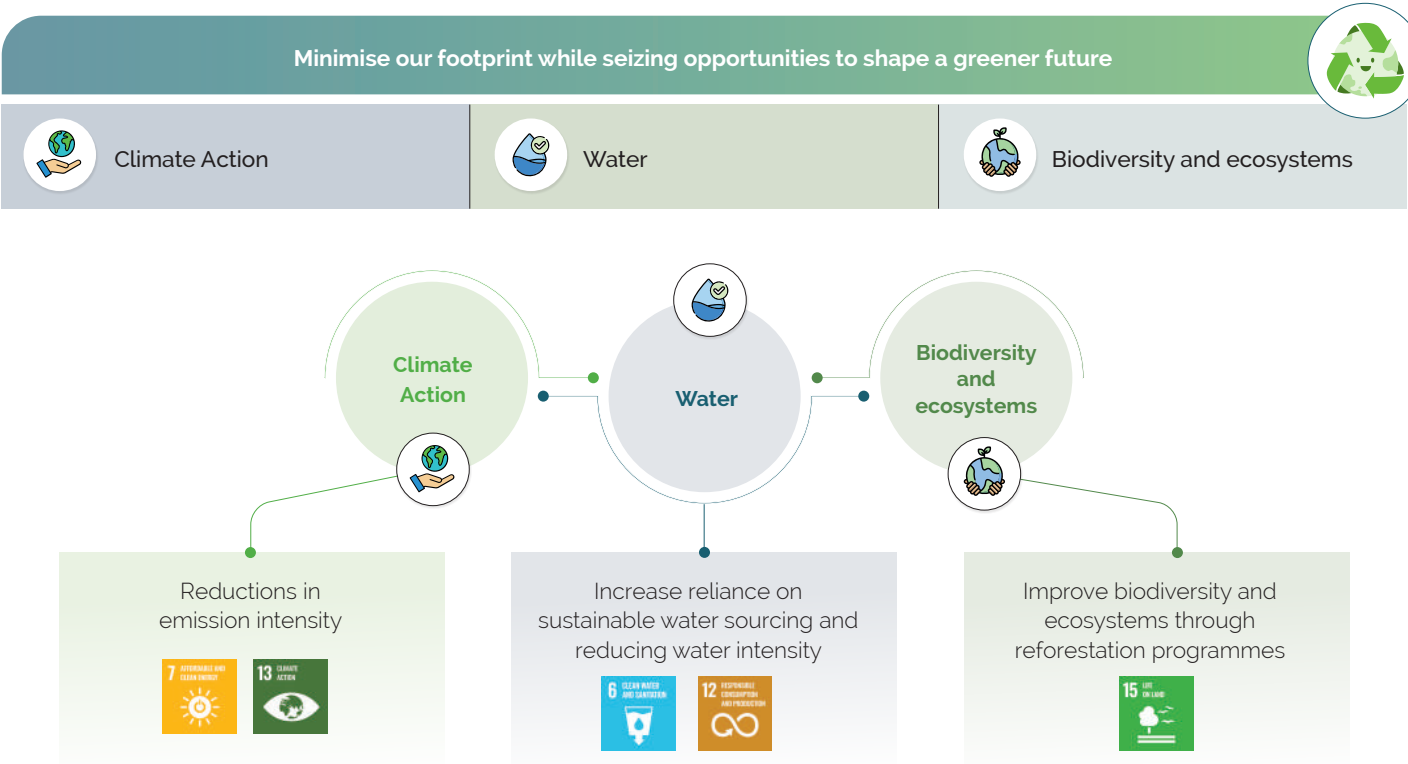
Anti-Corruption programme: The Company's Anti-Corruption programme aims to prevent, detect and address corruption within the organisation and has been developed in line with the United Nations Global Compact's Management Model and structured on the following pillars.



Ethics and culture: The Company's Directors and all employees are governed by the Hayley's Group's Internal Code of Conduct- the Hayleys Way which explicitly sets out the behaviour expected from an employee in reinforcing the Group's organisational values.

Elevating the Health of the Planet

The Company's most significant environmental impacts stem from the relatively high use of energy in its manufacturing operations, the resultant generation of GHG emissions as well as water usage and potential biodiversity impacts. Our environmental agenda centres on minimising the footprint of these environmental impacts, while driving innovation and improved resource efficiency to build a more sustainable and resilient operating model. The Company's environmental strategy is also guided by the aspirations of the Hayleys Lifecode and its overarching environmental objectives.



Climate Action

As a Company engaged primarily in Aluminium extrusion, the organisation generates emissions mainly in its melting and heating processes. We adopt a life cycle perspective to mitigating emissions, with our reduction plan centred on reducing emissions both within our operations and across the supply chain. The Company's emission reduction plan is aligned to the International Aluminium Institute's 1.5°C pathway for the Aluminium sector and includes annual targets and clearly defined action plans. The Company computes its GHG emissions based on The Greenhouse Gas Protocol published by the World Resources Institute and World Business Council for Sustainable Development and also obtains third-party assurance on its emission inventory based on the ISO 14064-1(2018)-Greenhouse Gases standard and established the required management system for collecting and ensuring the credibility of emission-related information. Performance against targets will be reviewed at least on an annual basis and publicly disclosed through the Company's Annual Report. The Company's climate-related targets, strategies and KPIs are set out below.

Elevating the Health of the Planet

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Energy intensity	Reduce energy intensity by 15%	- Implement Energy Management System based on ISO 5001:2018 standard by 25/26 - Map energy loss points across the entire process chain and implement remedial action	14.42 MJ/MT	Target 7.3: By 2030, double the global rate of improvement in energy efficiency 
Renewable energy	10% of energy consumption to be fulfilled by renewable sources	Conduct feasibility studies and prepare five-year action plan for solar PV installation of approximately 9 MW	1.2 MW	Target 7.2: By 2030, increase substantially the share of renewable energy in the global energy mix 
Emission reduction plan	25% reduction in emission intensity 16% reduction in Scope 1 emission intensity 40% reduction in Scope 2 emission intensity	- Reduce general usage of compressed air - Measure emissions of each production line and set define targets for air compression - Optimise transportation and distribution	Overall emission intensity 1.64 tCO ₂ e/MT	Target 13.2: Integrate climate change measures into national policies, strategies and planning 

Water

Water usage occurs across the Company's manufacturing processes, which include anodizing, powder coating and cooling as well as general use by employees. Water requirements are met through surface water withdrawal as well as municipal lines and ground water sources. Our water targets centre on the responsible withdrawal, use and management of water through increasing the efficiency of the Company's water usage while reducing water withdrawal through relying more on sustainable water sources. Information related to water withdrawal and usage is measured on a monthly basis, and publicly reported through the Company's Annual Report. Meanwhile, material water-related risks are monitored and reported to the Company's ESG Committee and Audit Committee through a structured ESG risk assessment mechanism. The Company's climate-related targets, strategies and KPIs are set out below.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Water efficiency	Reduce water intensity by 30%	Drive efficiency improvements in water utilisation across the manufacturing processes	14.36 litres/ MT	Target 6.4: By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity 
Sustainable water sourcing	Achieve 25% sustainable water sourcing over total water consumption	Establish rainwater harvesting across key facilities	-	

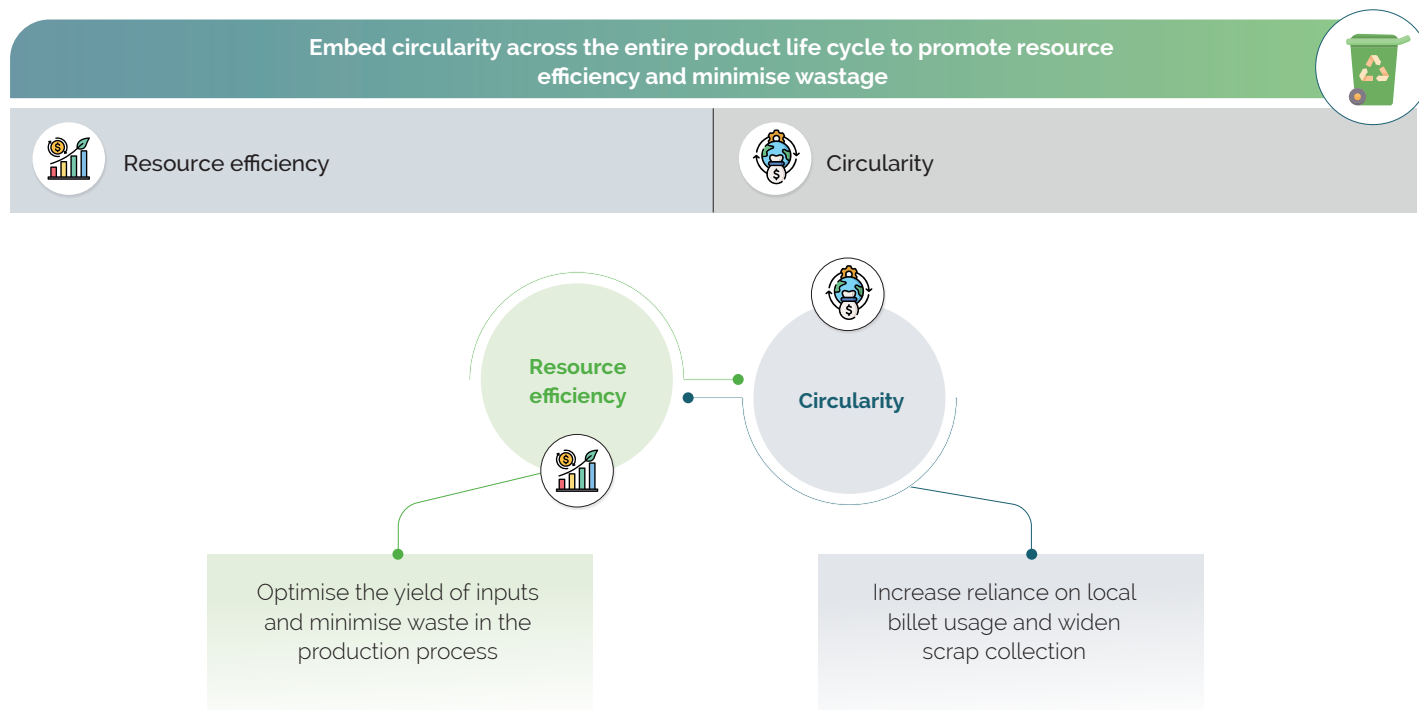
Biodiversity and ecosystems

The Company's manufacturing facilities are located in industrial zones and therefore have relatively low biodiversity value. However, in line with the environmental aspirations of the parent entity, Alumex is committed to contributing towards enhancing biodiversity and preserving ecosystems through investments in reforestation. Meanwhile, measures have also been implemented to continuously monitor potential impacts on biodiversity and ecosystems from land use and other activities through ongoing risk assessments, which have been incorporated into the Company's ongoing ESG risk assessment mechanisms.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Biodiversity preservation	Increase reforestation to maintain 0.5 times compared to the area occupied by company	- Engage in Hayleys Kirulu and contribute 100 trees per year - Ongoing investments in biodiversity enhancing programmes	3.37 acres	Target 15.2: By 2020, promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally 

Elevating our Product Proposition

We are committed to embedding sustainability thinking across the entire product life cycle, from the procurement of raw materials to product design, manufacturing and distribution. Our efforts are aimed at enhancing sustainability life cycle impacts through increasing resource efficiency, optimising input materials, minimising the generation of waste and increasing reliance on recycled Aluminium in our manufacturing processes. Over the long-term the Company is also focused on contributing towards reducing the country's overall Aluminium waste through widening collection centres for the collection of Aluminium scrap.



Resource Efficiency

This pillar of the Company's ESG strategy aims to optimise the use of input materials such as powder consumption and improving the extrusion yield in manufacturing. Focus will also be placed on reducing waste generated through operations which include sludge and ash. Alumex also continuously quantifies and monitors its waste generation and water discharge, which is disclosed in the Company's Annual Report in line with the GRI Standards. The Company has also formulated a waste management strategy, which includes hazardous and non-hazardous waste and effluents with incremental plans to minimise such impacts over time. This strategy will be reviewed and revised at least biennially to ensure relevance and applicability amidst changing operating dynamics. The Company's environmental risk assessment framework also includes assessment of risks relating to waste, effluents, potential spills and leakages.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Waste management	Decrease ash quantity by up to 7% Decrease ETP sludge generation by 35%	- Optimise scrap loading times and method - Optimise usage of polymer to reduce moisture levels - Optimise disposal acid volume	9% 250 m3	Target 12.4: By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse 
Optimise input material	Improve utilisation of powder consumption by 28%	- Improve waste powder percentage by reducing re-work and rejections - Improve filtration mechanisms - Control powder coating thickness	5.44 m2/KG	

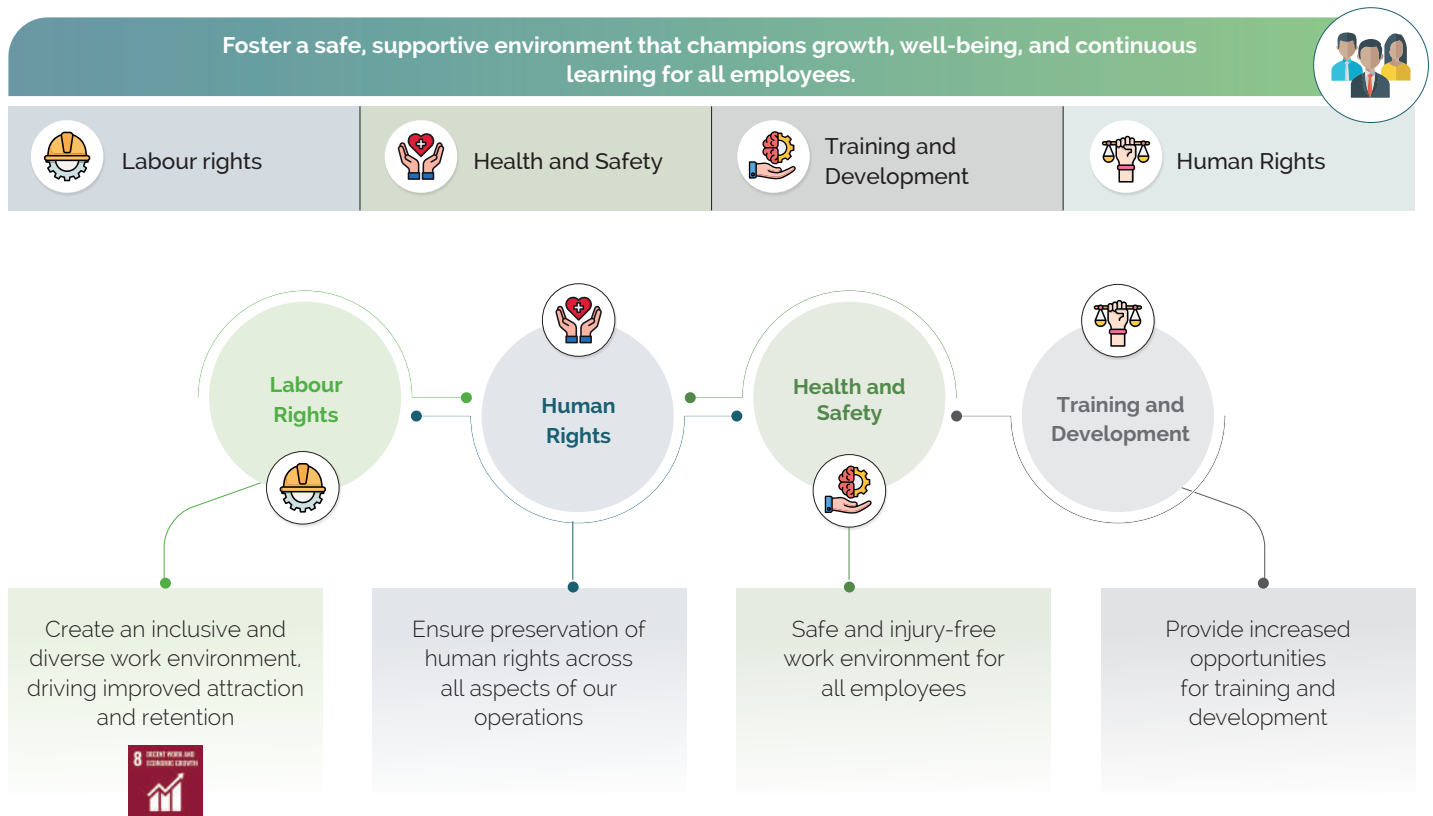
Circularity

The Company is committed to embedding circularity across its operations and value chain, with focus on increasing reliance on recycled Aluminium, which in turn would reduce dependence on virgin material. Over the medium-to-long term, the Company also intends to engage in product life cycle assessments for its major product lines, thereby identifying impact categories across both the environmental and social spheres. Measures are also in place to engage with local and provincial recycling networks to widen the Company's collection of scrap aluminium, thereby contributing towards minimising the country's national aluminium waste.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Circularity	Sustain the percentage of local billet consumption by utilising maximum plant capacity Increase scrap collection up to 300MT per month	- Gradual increment of monthly production while maintaining a minimum of 20% reliance on local billet consumption - Develop strategy on scrap collection	55% 150 MT	Target 12.4: By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse 

Elevating our Human Capital

The Company's labour policy framework and practices are designed to comply with all relevant national regulations and are aligned to Core Conventions of the ILO, the Sustainable Development Goals and the Universal Declaration of Human Rights (1984). The employee value proposition centres on creating a diverse and engaged team which can thrive in a conducive and safe working environment. The Company recognises employees' right to association and collective bargaining, with nearly 60% of the Company's non-executive employees represented through 2 trade unions. We have also established open and transparent communication channels which include formalised grievance mechanisms and employee satisfaction surveys.



Labour Rights

The Company's HR policies are aligned to that of its parent entity and are designed to create an inclusive and equitable culture. Employees are not discriminated on gender, race, religion or any other form of diversity, with equal opportunities ensured in recruitment, remuneration determination, promotions and opportunities for training among others. The Company's employee-related aspirations on this pillar centre on retention and satisfaction as detailed in the table below.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Employee Retention	Achieve overall employee retention rate up to 90%	- Benchmark remuneration schemes at least every 3 years - Review and upgrade existing employee engagement plans - Review production and attendance incentive schemes	82%	Target 8.5: By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value
Employee Satisfaction	Achieve overall employee satisfaction rate up to 75%	- Develop employee personal development plans - Formulate and implement a roadmap aligning with the requirements of Great Place to Work (GPTW) survey	67%	

Health and Safety

As a manufacturing organisation providing a safe and injury-free work environment to all employees remains a priority for the Company. The Company's occupational health and safety (OHS) management system is underpinned by the framework required for the ISO 45,001 certification which clearly sets out the objectives, worker participation, hazard identification and risk assessment methods, compliance and monitoring among others. The OHS system will be reviewed and updated at least once every two years, the effectiveness of which will be publicly disclosed through the Company's Annual Report.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Work place injuries	Zero significant work place injuries and occupational diseases	Improve injury recording (both accidents & near misses) across the organisation	73	Target 8.8: Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment
Safety capacity building	Average 3 hours training per annum/ employee on health and safety training	Develop comprehensive occupational health and safety training prospectus	2	
Compliance	Achieve 100% safety compliance to defined safety requirements/ guidelines	- Review departmental risk assessments every six months to identify hazards - Conduct monthly safety audits	80%	

Elevating our Human Capital

Training & Development

The Company's talent development agenda centres on nurturing both technical and soft skills through providing ongoing opportunities for training. Training needs are identified during the annual performance appraisals and delivered through a blended approach of on-the-job training, structured programmes and digital learning.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Training and development	Average training hours of 20 hours/employee	- Strengthen in-house training capabilities - Launch digital learning platforms - Develop training prospectus bi-annually and determine annual training plan	9.6	Target 8.2: Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high-value added and labour intensive sectors 

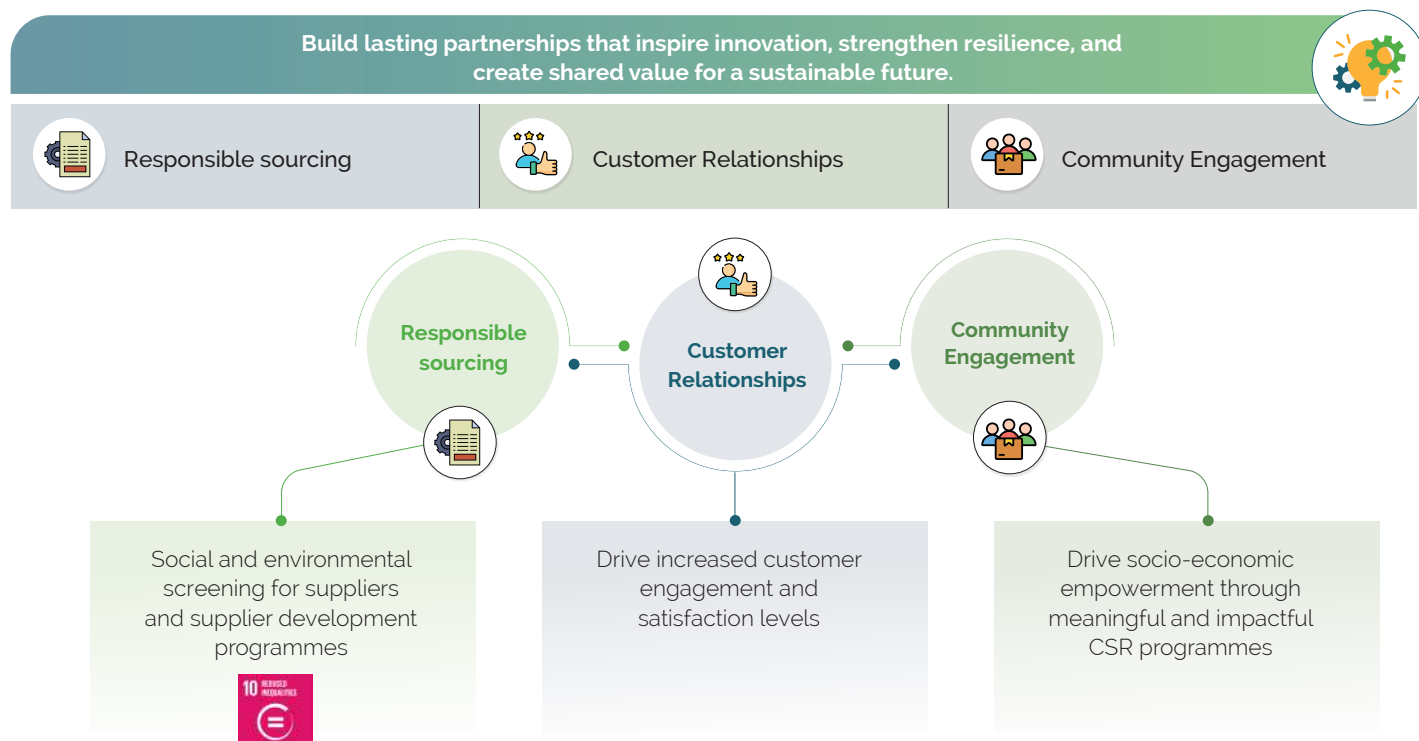
Human Rights

Alumex takes appropriate measures to identify, assess, prevent and remedy potential and actual impacts on Human Rights across its operations and value chains. The Company's Human Rights framework comprises the relevant policy commitments and due diligence practices which have been designed in line with the United Nations Guiding Principles on Business and Human Rights. The due diligence process is based on the OECD's five-step framework which includes management systems, risk assessments, annual audits and reporting. Reporting on human rights is in line with the GRI Guidelines including GRI 412: Human Rights Assessment 2016. The Company's other human-rights related aspirations include creating a diverse and inclusive work culture and increasing diversity levels in leadership roles.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Diversity and equal opportunity	Increase female representation in leadership roles 10%	- Introduce female mentoring programmes - Identify and develop high-performing female employees - Launch family-friendly work practices		Target 5.5: Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life 
Anti-discrimination training	1 hour per employee/ per annum training on anti-discriminatory training for all employees	Develop comprehensive training prospectus to cover anti-discrimination		

Elevating our Partnerships and Collaborations

The Company seeks to leverage its diverse stakeholder partnerships in advancing its sustainability aspirations, enabling it to scale impact, pool expertise and strengthen resilience across the entire value chain. This pillar of the 'Elevate' centres on the four key areas of preserving human rights, customer relationships, responsible sourcing and community value creation.



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Customer Relationships

Aligned to the organisation's overall business strategy, the Customer pillar of the ESG agenda seeks to strengthen customer relationships through effective engagement and identification of concerns, which subsequently forms a key input to the Company's decision-making process. In the short-term measures are in place to strengthen the Company's customer grievance handling process while long-term targets aim at gradually increasing customer satisfaction levels to 85% by 2030.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Customer satisfaction	Increase overall customer satisfaction score to 85%	- Conduct customer satisfaction surveys for all customer segments on a quarterly basis - Strengthen engagement and information sharing with customers	78%	-

Elevating our Partnerships and Collaborations

Responsible Sourcing

The Company is committed to propagating good ESG practices across its supply chain, with the long-term aspirations of driving shared value creation and socio-economic empowerment, effectively managing supply chain risks and strengthening supply chain resilience. This is to be achieved through conducting social and environmental screening of suppliers as well as long-term supplier development programmes for local suppliers.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Responsible sourcing	Achieve 90% social and environmental screening of suppliers	Define and implement criteria to screen new suppliers for social and environmental performance during onboarding	Baseline to be established in 2024/25	Target 10.1: By 2030, progressively achieve and sustain income growth of the bottom 40 per cent of the population at a rate higher than the national average 
	Conduct a strategic long-term supplier development plan covering of local suppliers	Identification of suppliers and launch of long-term development plan		

Community Engagement

The Company's CSR agenda seeks to foster long-term, mutually beneficial relationships with the aim of building trust and driving socio-economic empowerment. In line with the Hayleys Group's approach towards CSR, community engagement initiatives are typically directed towards education, health and well-being and/or culture.

Area of focus	2030 target	Strategy/action	Baseline performance	Relevant SDG and target
Community engagement	Double CSR beneficiaries	- Develop CSR policy - Develop annual CSR plan	Insert baseline beneficiary number	N/A Target 4.3: By 2030, ensure equal access for all women and men to affordable and quality technical, vocational and tertiary education, including university 
	Increase coverage of fabricators trained by 20%	Facilitate NAITA accreditation for fabricators	Insert baseline number	



The Company's comprehensive suite of ESG policies ensure consistency in decision-making while aligning the organisation's actions with its ESG aspirations.

Environmental Policies

1. Energy and Emissions Management Policy

The Alumex PLC is deeply committed towards conducting business in an environmentally responsible manner. The Energy and Emission Management Policy has been formulated to ensure all our businesses align to a consistent set of guidelines on environmental stewardship.

Alumex operate within the framework of an Energy and Emission Management that is aimed towards minimising adverse environmental impacts caused by natural resource depletion and greenhouse gas emissions. This framework encourages the optimisation of energy usage by driving increased energy efficiency and increasing reliance on clean energy sources.

Company ESG strategies relating to management of energy consumption, our targets and annual key performance indicators are set out under Energy & Emission Management Strategies, Targets and KPIs which forms an integral part of this framework.

Scope

This policy is applicable to all operations and relevant service providers of Alumex PLC, encompassing its manufacturing facilities and associated business activities.

Our Commitment

As an environmentally responsible organisation, the Alumex PLC is committed to the following energy and emission management programs;

• Compliance with all relevant laws and guidelines, national and international standards and all other requirements on energy & emission management practices (Sustainable energy Authority / Sustainable Development Goals / UNGC / Responsible Care Council etc.)	Compliance
• Identifying and appointing competent teams to effectively implement energy and emission management programs aligned with the operating model and business requirements of each sector	Assign competent teams
• Ensuring 100% complete and accurate reporting of relevant energy and emission data on a timely basis following the set reporting frameworks based on GHG protocol and national guidelines.	Accurate and timely reporting
• Implementation of energy and emission management programs focusing on the materiality of relevant energy / emission aspects. In driving these programs, identify all energy and emission related processes and applications, evaluate the significance, set targets and objectives, continuously monitor performance and drive the program based on defined KPIs.	Implement holistic energy and emission management programs at all entities
• Ensure the availability of relevant information, documents, training tools and guidance to drive the defined energy and emission management programs	Availability of resources
• Gradually shift from non-renewable energy sources and increase reliance on renewable energy such as solar.	Shift to renewable energy
• Minimising energy related environmental impact and application of Life Cycle Assessment (LCA) concept, carbon neutral operations and many other recognised green concepts	Minimise energy related impact on environment
• Adopting energy and emission conscious procurement procedure on all relevant operations and propagate our energy and emission management practices across supply chain. Effective operation and maintenance programs to ensure energy efficient operations while minimising emissions for significant energy consuming applications (machines / processes)	Energy and emission management
• Nurturing culture of energy and emission consciousness across all the relevant stakeholder groups (e.g., employees, communities, non-profit organisations, government etc.) and all business entities within the company should observe the energy practices of its supply chain partners and encourage the use of clean energy across its supply chain	Energy and emission conscious cultures

This policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practices.

2. Water Management Policy

The Alumex PLC's Water Management Policy seeks to conserve and optimise water obtained from various sources, seek avenues of recycling and reusing waste water and responsible disposal of waste water generations in its operations. Environmental, social and governance aspects of water management have been adequately addressed through this policy.

Company ESG strategies relating to management of water, our targets and annual key performance indicators are set out under Water Management Strategies, Targets & KPIs which forms an integral part of this standard.

Scope

This policy is applicable to all operations and relevant service providers of Alumex PLC, encompassing its manufacturing facilities and associated business activities.

Our Commitment

As the issue of water scarcity gains global attention, water conservation has been identified as a key priority in the company's environmental agenda. Following are the key aspects relating to the ESG framework over water applications:

Compliance with all relevant laws and guidelines, national and international standards and all other requirements on water management	Compliance
Implementation of a water management strategy aligning with the CEO's water mandate by UNGC (six elements of the mandate – Direct Operations, Supply Chain and Watershed Management, Collective Action, Public Policy, Community Engagement, Transparency – through individual and collective efforts) and all other relevant requirements	Implement water management strategy
Identify, clearly map and measure all water inputs (classified by source), water applications (process and non-process water), water distribution plans and waste water generation (hazardous and non-hazardous) within the defined boundaries	Mapping of water sources, applications, distribution and wastewater generation
Identifying and appointing competent teams to effectively implement water management program aligned with the operating model and business requirements of each sector	Identify and assign individual and functional roles and responsibilities
Ensuring the 100% complete and accurate reporting of all relevant data on timely basis (Metering should be available for main water inputs and wastewater outputs) Furthermore, it is recommended that sub metering processes be established based on the level of water consumption and wastewater generation)	Accurate and timely reporting with reliable metering at source
Water management targets and objectives should be set and continual improvement program should be driven (focusing on monitoring, corrective and preventing actions, auditing and reviews on water management)	Set water management targets and objectives
Ensure the availability of relevant information, documents, training tools and guidance to drive the defined water management programs	Availability of resources
Introducing sustainable sourcing of water, water reusing opportunities, recycling practices and any other innovative solutions aimed at minimising the water footprint of the companies	Sustainable sourcing, reuse, recycling of water and innovation to minimise consumption
Ensure the appropriate and adequate treatment of raw water inputs and waste-water discharge to ensure it meets the quality parameters for its designated usages and discharge standards (prior to discharge into the environment or further treatments)	Water quality controls

Environmental Policies

Properly track and manage all the waste water discharges and locations with quantity and quality while ensuring the environmental compliance.	Manage discharge of wastewater
Effective operation and maintenance programs to ensure water efficiency of all the relevant operations	Water efficiency
Foster a water-conscious culture focusing on conserving and reducing water utilization through various technologies, process improvements and through stimulating behavioural changes in staff through awareness campaigns	Water conscious culture
Driving corporate responsibility programs focusing on water management applications	Water management related CSR activities
Aligning with the Hayleys Group Sustainability strategy	Align to Group

This policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practices.

3. Material and Waste Management Policy

As an environmentally responsible corporate, Alumex PLC places priority on optimising and managing material consumptions through best business applications while minimising waste generation and effectively managing the waste generated through sustainable disposal methods. This guideline will ensure the implementation of effective material and waste management practices across all the companies irrespective of their operations.

Company ESG strategies relating to management of material and waste management, our targets and annual key performance indicators are set under Materials and Waste Management Strategies, Targets and KPIs which forms an integral part of this standard.

Scope

This policy is applicable to all operations and relevant service providers of Alumex PLC, encompassing its manufacturing facilities and associated business activities.

Our Commitment

This policy relates to all types of materials (that are used to produce and package the organisation's primary products and services) and relevant solid waste generated within our operations. The following guidelines are aimed towards the implementation of sustainable material and waste management practices across the company.

Overall: Materials & Waste	
Compliance with all relevant laws and guidelines, national and international standards and all other requirements on material and waste management	Compliance
Ensuring 100% complete and accurate reporting of all relevant material and waste generation data on a timely basis	Accurate and timely reporting
Identifying and appointing competent teams to effectively implement material and waste management programs	Identify and assign individual and functional roles and responsibilities
Promoting waste management through identified corporate responsibility programs	Waste management-related CSR activities

Establishing proper environmental grievance handling mechanism to handle all possible environmental and social issues from stakeholders	Environmental grievance handling mechanism
Introducing possible waste minimisation practices while improving resource efficiencies through application of LCA concepts, lean manufacturing practices, innovation & technology applications and application of any other material and waste management related concepts	Innovation to drive resource efficiency
Materials	
Establish a comprehensive system to capture all quantitative information pertaining to renewable and non-renewable material consumptions (raw material / semi-manufactured goods / associate process materials / packaging materials etc.)	Capture quantitative information in sufficient detail
Establish a material management program to prioritise sustainable material sourcing while increasing the use of recycled and reclaimed material inputs where ever possible	Prioritise sustainable sourcing
Sustainable material sourcing, green procurement practices, sustainable supplier evaluations and safe material handling should be practiced across the group.	Comprehensive sustainable sourcing practices to be adopted by Group
Waste	
Defining the solid / semi solid waste categories within operating boundaries, map them accordingly and implementing mechanisms to quantify waste generation	Quantifying waste generation by appropriate categories
Establishing waste management programs focusing on minimising, reducing and controlling waste generation. (Program should be developed based on 7R [Reject, Reduce, Reuse, Reclaim, Replace, Repair, Recycle] concept applications over significant operations identified)	Waste management programs based on the 7R concept for significant applications
Proper segregation practices should be implemented across all the categories of waste generation (process and non-process)	Segregation of waste
Segregated waste should be stored separately complying with all the relevant legal and other requirements (availability of separate waste storage for hazardous and non-hazardous waste, following defined colour code and labelling mechanism, zero contamination to the environment, application of emergency preparedness programs, health and safety requirements on waste handling etc.)	Compliance over safe storage of waste
Ensure the sustainable disposal of all types of waste by following "zero landfilling" (getting into agreements with legally accepted waste collectors and disposers, ensure the proper disposal through audits and proof documentations, maintain records of all the waste disposals)	Sustainable disposal of waste
Establishing material and waste management targets, objectives and drive continuous improvement programs (focusing on monitoring, corrective and preventing actions, auditing and reviews on waste management)	Establishing targets and objectives to drive continuous improvement
Ensure the availability of relevant information, documents, training tools and guidance to drive the defined waste management programs	Training and tools to enable performance

This policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practices.

Environmental Policies

4. Biodiversity & Ecosystem Management Policy

The Alumex PLC is deeply committed to preserving biodiversity and natural habitats. We are mainstreaming the concept of biodiversity across value chains and adopting the precautionary approach for sustainable management of biodiversity in all decision-making processes. Diversity of ecosystems, species and genes and the ecological processes that support them are prevalent in and around the Alumex business operations.

Company ESG strategies relating to management of Biodiversity and Ecosystem, our targets and annual key performance indicators are set under Biodiversity and Ecosystem Strategies, Targets & KPIs which forms an integral part of this standard.

Scope

This policy is applicable to all operations and relevant service providers of Alumex PLC, encompassing its manufacturing facilities and associated business activities.

Our Commitment

We seek to avoid and minimise any significant impacts our operations may have on sensitive species, habitats and ecosystems. This means that we:

Ensure legal compliance with respect to biodiversity by complying with rules and regulations related to all environmental aspects (e.g. forest, wildlife, coastal zone, green cover, water bodies etc.) during the organisational operations	Compliance
Map existing biodiversity aspects, identifying significant impacts and develop sector level customised biodiversity and ecosystem conservation strategies aligning to the Group Sustainable Business Framework	Align to ESG Framework and develop sector level strategies
Identifying and appointing competent teams to drive effective implementation and ensure the availability of relevant information, documents, training tools and guidance to effectively drive the biodiversity and ecosystem conservation strategy	Identify and assign individual and functional roles and responsibilities
Define best quantification mechanism for biodiversity and ecosystem impacts and ensure the 100% complete and accurate reporting, tracking and record keeping of all relevant progress / impacts on timely basis	Complete and accurate reporting on time
Align our biodiversity and ecosystem journey with national and global level biodiversity road maps and drive initiatives for restoration of degraded habitats and enhancement of biodiversity in areas (near or far to establishments) which may have been lost due to human intervention	Align with national and global roadmaps
Minimisation of adverse impacts on biodiversity and ecosystem through the right combination of sustainable industry practices and technologies	Sustainable practices and technology
Capacity building and regular knowledge sharing on biodiversity with relevant stakeholders	Capacity building of stakeholders
Raise employee awareness with the aim of extending the program impact into employees' work places as well as their communities	Employee awareness
Promoting biodiversity and ecosystem conservations through identified corporate responsibility programs	Biodiversity conservation related CSR activities
- Establishing suitable communication programs through: Participating in industry associations and other forums to share and promote best practices for biodiversity conservation - Communicating biodiversity and ecosystem related activities to employees and outside audiences. Engaging with government, local communities and others to understand and work to address significant biodiversity issues in areas where we operate	Promoting best practices Community engagement for biodiversity conservation

This policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practices.

Social Policies

1. Industrial Relations Policy

1. Purpose

This policy provides guidance to all those who are involved with Industrial Relations to ensure cordial relations, social dialogue and a productive work environment. The intention is that through joint problem solving mutually beneficial results could be achieved for the greater benefit of all stakeholders.

Definitions

Industrial Dispute – "Any dispute or difference between an employer and a workman or between employers and workmen or between workmen and workmen connected with the employment or non-employment or the terms of employment or with the conditions of labour or the termination of the services or the reinstatement in services of any person.

"Workmen" include a trade union consisting of workmen.

2. Scope

Given the large number of employees in the group in the various categories, employees are the most valuable asset in the group that needs to be managed in a mutually beneficial manner.

Many of the employees are members of unions and collective bargaining and problem solving is an integral part of the smooth functioning of work places.

3. Methods for settlement

- i. Discussion and Consensus
- ii. Conciliation
- iii. Arbitration – Compulsory or Voluntary
- iv. Industrial Courts

3.1 Discussion and Consensus

Collective agreements and check off agreements set out the procedure that needs to be followed in the event an industrial dispute arises.

In the event of a dispute arising parties should endeavour to resolve such dispute in the following manner:

- i. Firstly, efforts should be made at the location level. The employee and/or the Branch union and the Management should attempt to settle such issue/ dispute at the location level.
- ii. In the event of non-resolution of the dispute at stage (i) above attempts should be made with the involvement of the Group Human Resources Division to resolve the dispute.
- iii. In the event of non-resolution of the dispute at Stage (ii) above, parties agree to meet at the Employers Federation of Ceylon (EFC) in order to resolve such dispute.

3.2 Conciliation

- iv. In the event of non-resolution of the dispute at Stage (iii) above, parties should endeavour to resolve the relevant dispute in accordance with the conciliation proceedings in terms of the provisions of the Industrial Disputes Act

3.3 Arbitration

Arbitration may take two forms:

Voluntary arbitration – where the parties' consent to a reference of an industrial dispute by the Commissioner General of Labour to an Arbitrator chosen by the

parties or chosen by the Commissioner General, if the parties cannot agree on a common nominee.

Compulsory arbitration – where the Minister of Labour refers such dispute for settlement to an Arbitrator appointed by him or to a Labour Tribunal notwithstanding that the parties do not consent to such a reference.

3.4 Industrial Court

The members of an Industrial Court are selected from a panel appointed by the President of the Democratic Socialist Republic of Sri Lanka from time to time. A matter comes before an Industrial Court only where the Minister of Labour refers an industrial dispute to it.

4. Trade Unions

No employer shall require an employee to join or refrain from joining, any trade union, or to withdraw from, or to refrain from withdrawing from, his membership of a trade union which s/he is a member.

An employer will bargain with a trade union which has in its membership not less than forty per centum (40%) of the workmen in the particular category of workers on whose behalf such trade union seeks to bargain.

Where one employer had two or more work places and the general demand in respect of one may be applicable to the other work places, the necessary representation required will be not less than forty per centum (40%) of the total workforce in that category of employees in all work places.

Social Policies

4.1 Check Off

The deduction of Union subscriptions from the salaries of employees and a remittance of same by the employer to the Union "check-off" is granted at the discretion of the employer.

It is recommended that prior to granting "check off" a check off agreement containing a dispute resolution procedure be entered into with the trade Union. Collective Agreements too could contain provisions with regard to the granting off check off facilities and the conditions relating to same.

5. Meetings with Branch Unions/ Employee Councils

It is recommended that meetings are held at regular intervals with branch unions/employee councils. It is further recommended that a predetermined agenda is used for such meetings and that minutes are maintained and shared.

6. Correspondence with Unions

In the event any correspondence is received from a Parent Union/ Branch Union it is recommended that the Management respond to same as expeditiously as possible. Where required the matter should be brought to the attention of Group HR and advice sought with regard to same.

If a response is provided in writing, the said response should be provided in a clear and unambiguous language. A Sinhala/Tamil version of the written correspondence should be provided where appropriate/practicable.

Responsibility

The heads of each business sectors, along with the heads of each business units and heads of HR will be responsible to ensure this policy is valued and adhered.

2. Disciplinary Policy

1. Purpose

This policy provides guidance to all employees who may be concerned or involved, either directly or indirectly in whatever capacity with disciplinary issues within the Hayleys Group. It is intended to ensure fair and just implementation of the disciplinary procedure and to ensure that full and speedy consideration is given to all relevant facts.

Definitions

1.1 Misconduct – "An act which is inconsistent with the fulfilment of express or implied conditions of service or if it has a material bearing on the smooth and efficient working of the concern"

1.2 An "Act" where relevant would include an "omission"

1.3 Group HR (GHR) – Group Human Resources Division of Hayleys PLC

Types of acts or omissions which would amount to misconduct are set out in Annexure I. This list is not exhaustive or exclusive Holding a disciplinary inquiry improperly is almost as objectionable as an inquiry not being held.

2. Scope

The disciplinary procedure set out herein is to apply to all categories of employees' subject to the condition that some employees could be governed by Collective Agreements which stipulate certain procedures that need to be adhered to and restrictions that need to be complied with. The nature of the particular business or the position held or occupied by the employee concerned maybe relevant to consider in deciding whether an act or omission amounts to misconduct.

The types of punishments that could be imposed are set out in Annexure II (the list of punishments is not exhaustive or exclusive).

3. Preliminary Investigation

Where an act of misconduct is committed by an employee that warrants disciplinary action:

3.1 Obtain written statements

3.1.1 Witnesses to furnish their own statements (preferred) or

3.1.2 A person in authority recording their statements and having them signed by the witness in question

3.1.3 The "accused" to be asked to furnish his statement (preferred) or

3.1.4 A person in authority recording the statement and having it signed by the "accused"

3.2 If the charges relate to goods or articles they should be carefully preserved, marked and sealed (where possible).

3.3 Sketches and photographs to be made or taken where relevant.

3.4 CCTV & other relevant recordings relating to the incident to be provided.

4. Suspension Pending Inquiry

4.1 Instances when suspensions should be considered

4.1.1 Where the charges if proved would normally result in the termination of employment and/or

4.1.2 Where the presence of the accused would cause a breach of the peace or damage to property or disturbance to the business and/or

4.1.3 Where his/her presence for some other reason is deemed undesirable

4.2 If the employee being suspended is governed by the terms of a collective agreement the time frames and provisions set out therein should be adhered.

Social Policies

4.3 Where there is no collective agreement, when an employee is being suspended, at the time of suspension or within a reasonable time thereof the employee should be informed in writing the reason for such suspension. The suspension letter should be signed by the head of the location or by someone authorised to do so on their behalf.

(A sample suspension letter pending inquiry is given in Annexure III)

5. Show Cause Letter

5.1 The show cause letter would be issued in English and where relevant a Sinhala/ Tamil version would be provided.

5.2 The show cause letter should specify the charge or charges against the employee.

5.3 In certain circumstances a show cause letter may take the form of recounting of all the incidents relating to the charge/s, followed by the formulation of specific charges based on those incidents.

5.4 Wherever possible it is advisable to avoid the use of criminal law terms e.g. Theft, Misappropriation etc. (as these offences have specific connotations in criminal law and there is no need for the employer to assume the burden of

proving the ingredients of those criminal law offences).

5.5 The show cause letter should also contain

5.5.1 The date, time, and place of commission of the act/s of misconducts where relevant

5.5.2 The time limit within which an explanation in writing should be tendered (if there is a collective agreement the period set out in same or at least three (3) full working days where no collective agreement is applicable – (If a reasonable extension of time is requested it should be allowed unless there are compelling reasons to refuse the request)

5.5.3 An intimation to the employee that should s/he fail to submit his/her explanation in writing by the specified date it would be presumed that s/he has no cause to show and action will be taken on that basis.

5.6 Where an employee is suspended the show cause letter should specify that s/he is suspended from work without pay (if such is the case) until further notice.

5.7 Where possible the show cause letter should be handed over to the accused employee in person and his/her signature obtained on the duplicate as evidence of receipt.

5.8 Where 5.7 is not possible the show cause letter should be transmitted by registered post/courier to his/her address. However, to expedite delivery the show cause letter could be scanned and sent via email / WhatsApp where sending by registered post/courier is not practically possible. GHR to be kept informed if this mode of communication is used and outcome of same.

5.9 Where a letter sent by post / courier is returned undelivered GHR should be consulted immediately.

6. Letter of Explanation

6.1 On receipt of the letter of explanation the employer must decide whether the explanation is acceptable or not. If acceptable and the employee is suspended s/he should be reinstated in service with full pay for the period of suspension.

6.2 If the explanation is not acceptable – where an employee denies the charges, s/he should be informed in writing that his/her explanation is unsatisfactory and unacceptable and that an inquiry will be held on a specified date and time and that s/he should be present at the inquiry with his/her evidence and witnesses, if any.

6.3 Where an employee admits to the charges unconditionally there is no necessity to hold a domestic inquiry. However, if the admission is made in qualified terms it is advisable to hold a domestic inquiry. It is also advisable to hold a domestic inquiry where it appears that there could be extenuating or mitigating circumstances.

6.4 Where the accused employee fails to tender his/her explanation within the stipulated time action can be taken on the basis that s/he has no cause to show. However, it is prudent to afford a reasonable time to him/her to submit his/her explanation before taking such action.

6.5 If an accused employee requests to examine the documents prior to furnishing his/her explanation, which could arise where an employee cannot be reasonably expected to answer the charges without reference to documents in the employer's possession, a date and

Social Policies

time may be fixed for the employee to examine the documents in the presence of an Executive. Copies of documents should not be given, and the employee should not be permitted to peruse the statements of witnesses.

7. Domestic Inquiry

7.1 When to hold a domestic inquiry

7.1.1 When the explanation given is unsatisfactory

7.1.2 Even where the employee does not furnish an explanation it could be useful to hold an inquiry to have the advantage of recorded statements of witnesses for use at a later stage before labour fora and also bona fides of the employer are strengthened.

7.2 Who should hold the domestic inquiry

7.2.1 Official of the Company not below the rank of Executive

7.2.2 Inquiring Officer should hold a position above the rank of the accused employee

7.2.3 Should not be a witness to the charges

7.2.4 In exceptional circumstances it may be prudent to get the services of an external inquiring officer.

7.3 Representation at domestic inquiries

7.3.1 Under no circumstances should the accused employee be represented by any person from within or outside the company.

7.3.2 The accused employee is entitled to have present at the inquiry an observer (who must be an employee of the company in a similar grade/rank) The observer cannot make statements or cross

examine witnesses but can take down notes of the proceedings.

7.4 Holding of the Inquiry

7.4.1 The inquiry should be conducted in a language that the accused employee is conversant in. A translator's services may be used where such services are necessary to proceed with the inquiry.

7.4.2 The inquiry will commence with the accused employee being asked whether s/he is guilty or not of the charges preferred against him/her.

7.4.3 If s/he pleads guilty s/he should be afforded an opportunity to make a statement in that connection as s/he could show extenuating or mitigating circumstances.

7.4.4 If the accused employee pleads not guilty the recording of the evidence on behalf of the employer should be done.

7.4.5 If an accused employee has been informed of the date and time of the inquiry but is absent but has made a request for a postponement such request should usually be complied with.

7.4.6 Where the accused employee is absent without explanation or request, one further opportunity should be given to attend the inquiry but, in the letter informing him/her of the new date it must be stated that if s/he persists in his/her absence without explanation the inquiry will be held ex parte.

7.4.7 If a witness is unable to give evidence in the language in which the inquiry is being conducted and if the accused employee is not conversant with the language in which the witness is able to give evidence the evidence should be translated and explained to the accused employee.

7.4.8 Evidence should be recorded in direct speech or as questions and answers.

7.4.9 The accused employee should be given the opportunity to question any witness and if s/he declines or once s/he finishes questioning it should be recorded that s/he has no further questions for the witness.

7.4.10 The accused employee can call witnesses on his/her behalf only after s/he himself/herself has given evidence.

7.4.11 Witnesses can be recalled, where it is deemed necessary.

7.4.12 Documents and productions should be kept in the possession of the inquiring officer during an inquiry.

7.5 Findings

7.5.1 A written report should be submitted by the inquiring officer to the General Manager – Group HR / Head - Group HR

7.5.2 The conclusion in respect of each of the charges as to whether the inquiring officer finds the accused employee guilty or not guilty should be stated.

7.5.3 Inquiring officer can find an accused employee guilty of a lesser charge

7.5.4 Inquiring officer can draw attention to extenuating and aggravating circumstances where such exist.

7.5.5 The General Manager – Group HR / Head of HR will share his/her views on the report so submitted with the HR Head of the employee's company and the GMC member where applicable to decide on a punishment (if any).

Social Policies

7.5.6 Within a reasonable time or within the time stipulated by the collective agreement the accused employee should be informed of whether s/he has been found guilty or not guilty of the charges preferred against him/her and the punishment if s/he has been found guilty.

8. Punishment

8.1 Punishment for acts of misconduct would vary on the gravity of the misconduct committed, length of service of the employee, his/her past record and the position occupied by the employee.

8.2 The possible attitude of the labour courts should also be considered in deciding the punishment.

8.3 When the punishment is short of dismissal the accused employee's signature should be obtained on the duplicate of the letter communicating the punishment.

9. Post Inquiry

9.1 If an employee's services are terminated a signed copy of the termination letter, inquiry report, inquiry proceedings, preliminary investigation documents and documents produced and marked at the inquiry, show cause letter, reply and other correspondence relating to the inquiry should be placed in the personal file and the personal file together with other objects produced at the inquiry (if any) should be kept in the custody of GHR to be used if needed at labour fora.

9.2 If the punishment is less than dismissal the acknowledgement copies of the letter of punishment, inquiry report, inquiry proceedings,

preliminary investigation documents and documents produced and marked at the

inquiry, show cause letter, reply and other correspondence relating to the inquiry should be placed in the personal file. If there are other objects they should be returned to the company or to the relevant party.

9.3 Even where an employee is found not guilty the letter informing him/her that s/he is not guilty, and the other documents connected with the inquiry should be placed in the personal file.

10. Responsibility

The Heads of all business sectors, along with the Heads of HR will be responsible in ensuring that this policy is valued and adhered to.

ANNEXURE I: Types of Misconduct

- Dishonest conduct
- Failure to account for company funds
- Violating the company's rules and regulations
- Neglect of duty
- Failure to carry out lawful instructions of the superior officer
- Insubordination
- Misuse of company property
- False or incorrect information in applications for employment
- Sleeping whilst on duty
- Being rude and abusive to a superior officer
- Being rude and abusive to a colleague or subordinate
- Keeping away from work without authority
- Keeping away from work in excess of leave entitlement
- Late Attendance

- Acting in a manner unbecoming of an employee of the company
- Intoxication during working hours
- Malingering
- False or misleading statements
- Smoking in a prohibited area
- Chewing betel in a prohibited area
- Taking mobile phones into a prohibited area without authority
- Assaulting a superior/colleague or subordinate

ANNEXURE II: Types of Punishments

- Verbal Warning
- Written Warning
- Deferment of an increment
- Stoppage of an increment
- Reduction of bonus
- Stoppage of bonus
- Suspending from work without pay
- Dismissal

ANNEXURE III: Suspension Letter Pending Inquiry

It is reported that on at a.m./p.m. you have (acted in the following manner)

You are hereby suspended without pay pending inquiry. A show cause letter will be sent to you in due course. You are prohibited from entering the premises of this company or any of its subsidiary or associate companies or the premises of Hayleys PLC or any of its subsidiary or associate companies without the written permission of the undersigned or the GM – Group Human Resources Management or the Head of Group HR.

Social Policies

3. Grievance handling Policy

1. Purpose

The purpose of this policy and associated procedure is to provide a structured grievance handling framework for the complainants as well as complaint recipients, and to provide guidelines on how to lodge a grievance and how that grievance will be resolved to ensure fair and equitable treatment to all our employees.

2. Definition

A grievance may be defined as a state of mind and dissatisfaction arising out of a course of action or decision made by a supervisor. Hence from the employee point of view such actions or decisions would be unfair, unjust or inequitable. Therefore, the employee naturally seeks relief and solutions.

3. Scope

This policy and procedure sets out the essential elements for the management of grievances of all employees across the Group from inception to final outcome.

4. Responsibility

NO.	JOB TITLE
1	Sector GMC member
2	Immediate Superior
3	Sector HR Manager

5. Policy Administration Procedure

5.1 Informal Procedure

Wherever possible, employees (or a representative from the respective union) are encouraged to discuss with the immediate Supervisor or Line Manager. However, if the grievance

cannot be resolved through an informal discussion the following formal procedure would apply.

5.2 Formal Procedure

5.2.1 If the grievance is not satisfactorily resolved with the immediate supervisor, the employee may submit a formal grievance in writing to the next higher-level supervisor/ department head.

5.2.2 The next higher-level supervisor/ department head will analyse the facts and arrive at a satisfactory solution in respect to the grievance.

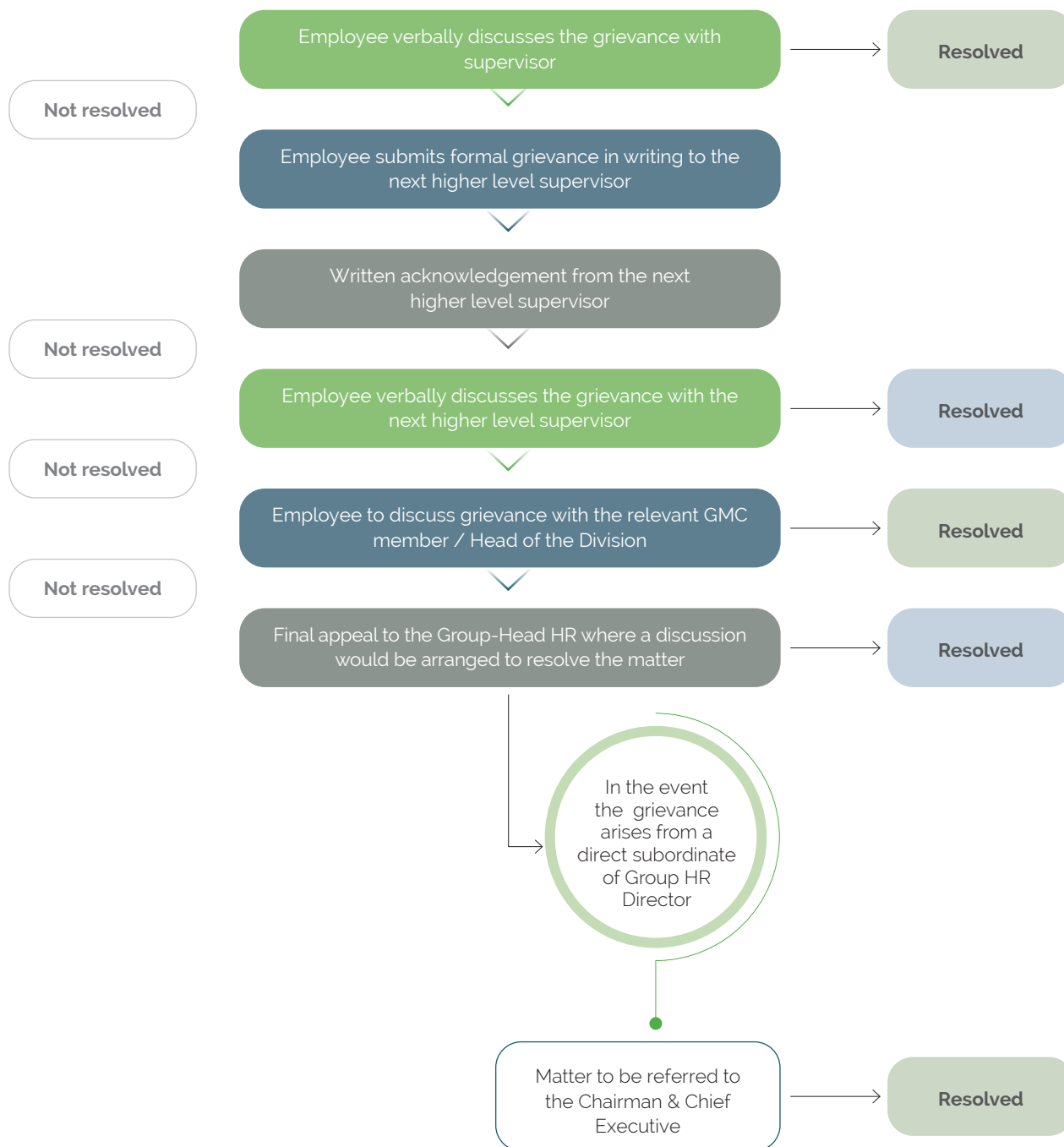
5.2.3 In the event of the grievance not being resolved at the level of the next higher-level supervisor/ department head, the grievance will then be discussed with the relevant GMC member, company head and /or a representative from HR.

5.2.4 The grievance review request form with the comments of the line manager should be referred to the GMC member. Such discussion will be arranged within 3-5 days of request made by the employee to the GMC member.

5.2.5 Further discussions will be conducted with the initiative of the GMC member and the respective supervisors and line managers will be called upon with the concerned employee with adequate notice.

5.2.6 The GMC member at his/her discretion refer any unresolved employee grievances to the Head-Group HR. In the event the grievance arises from a direct subordinate of the Head of Group HR then the matter will be referred to the Chairman and Chief Executive of Hayleys PLC or a senior Non-Executive Director of Hayleys PLC.

6. Employee Grievance Process



Social Policies

4. Recruitment Policy

1. Introduction

1.1 Philosophy

At Hayleys, we believe that people make the difference between a good organisation and an excellent one. The aspirations, competencies and commitment of our people are at the heart of all our achievements.

Our Work environment facilitates:

- Recognition and rewards for performance
- Learning, development and empowerment
- Sharing of managerial experience, exposure and expertise
- Personal, Professional and Career growth
- Creativity and Innovation
- Equality and Fair play
- Social responsibility in all that we do

What we offer our employees is the opportunity to enhance their potential, perform and achieve their career ambition.

1.2 Objective

This Recruitment policy is developed with a view,

1.2.1 to provide a clear understanding of the recruitment process at Hayleys Group.

1.2.2 to hire the right persons at the right time for vacant positions.

1.2.3 to ensure that they possess the required competencies at the required level to perform their jobs in an effective and an efficient manner.

1.3 Scope

1.3.1 This process applies throughout the Hayleys Group for which candidates shall be sourced internally and externally.

1.3.2 Employment Categories

Employees are categorised in the following grades of the Company.

- Managing Director
- CEO
- General Manager
- Senior Manager
- Manager
- Assistant Manager
- Senior Executive
- Executive
- Junior Executive
- Officer
- Clerical
- Manual Staff

2. Position Request

2.1 Vacancies

Sector HR Heads are required to provide details of current head count as well proposed head count at the time of manpower planning for the budgeting process in respect of each financial year.

A Position Request may occur due to the following:

- a. Creation of a new position
- b. Replacement of an existing position.

Suspension or No-pay leave of an employee does not create a vacancy. In case of such 'Temporary Vacancy,' another employee may be assigned to cover the work of the position or based on business needs an incumbent could be hired on a temporary contract basis.

2.2 The Position

A vacancy in the approved cadre is always for a specific position and has a specific evaluated Job Description (JD). A JD will include the Job Title as indicated in the Organisation chart, the job purpose, responsibilities, qualifications and experience required.

Social Policies

2.3 Employment Vacancy Request

All vacancies at Hayleys Group shall be filled through internal recruitment; if no suitable person is found within the company, external recruitment will take place.

2.3.1 The Position Request Form

2.3.1.1 The PRF shall contain the following details:

- Company Department
- Job Title Category
- Number of Vacancies to be filled
- Reason for vacancy (e.g. replacement for person x)
- Cadre - Budgeted/Unbudgeted
- Advertising Method
- Approval for recruitment

2.3.1.2 The specific evaluated Job Description needs to be attached at the time of forwarding the PRF to the recruitment section in Hayleys Group HR (GHR).

2.3.2 Role of Sector/Sector Human Resources

2.3.2.1 Sector/SBU HR Managers should raise a PRF for all vacancies in their Companies:

All Replacements should be approved by the Head of the respective Company

All New positions (budgeted and unbudgeted) should be approved by the GMC member for that sector

2.3.2.2 The Line Manager will also be required to justify the need for the new positions (budgeted and unbudgeted) to the SBU/Sector Head at the time of raising the PRF

3. Sourcing

3.1 Internal Recruitment

Will be done by way of Internal Vacancy Notice (IVN) or identified employees from the succession pool.

3.2 External Recruitment

If external hiring is approved, candidates for such positions would be sourced through press advertisements, Hayleys Careers website, CV Data Bank, Online Advertising, Head hunting, Recruitment Agencies, employee referrals, participation at job fairs etc.

3.2.1 Advertising

The closing date for all press advertisements will be 07 days from the date of publication. Candidates can apply for position through:

Hayleys Careers website:
(www.hayleys.com/careers)

Hayleys Careers email:
(careers@hayleys.com)

- No late applications shall be entertained

3.2.3 Internships

An Intern would be a student/ undergraduate, participating in a program of temporary, supervised work in a particular field where the Company grants an opportunity for the potential intern to gain practical experience. Internship

opportunities are granted solely for the benefit of the students/undergraduate in order to provide exposure to a professional work environment and sharpen the desired skills and competencies needed for the corporate world.

The placement of such students to any Company/SBU should have approval from the respective Head of the Company.

3.2.4 Local and Expatriate Recruitment (for Senior Management of the Group) The Management reserves the right to use its discretion to identify and appoint candidates to identified positions in the Company.

3.3 Initial Evaluation and Short Listing of Applications

All applications received shall go through an initial evaluation and short- listing as per the requirements of the advertisement and as detailed in the qualification matrix by the Company HR Division. The applications shall be forwarded to the Line Managers thereafter for further evaluation.

4. Interview Process

Interviewing is considered to be one of the most important stages in the selection process and shall be conducted in a fair and impartial manner.

4.1 Preliminary Interviews

The Company/SBU will facilitate the preliminary interview process within 05 working days of finalising the initial shortlist of candidates.

4.1.1 Panellists

Panellists for the preliminary Interview will consist of:

- SBU Head
- Immediate Supervisor

- Location HR Executive/Manager / Hayleys Group HR (if required)

4.2 Second/Final Interviews

4.2.1 Panellists

Panellists for the second/final Interview will consist of:

- Assistant Manager and Executive - Immediate Supervisor +Company HR Head + SBU Head
- Manager and DGM - SBU Head + Company HR Head + GMC Member
- GM and above - SBU Head + Company HR Head + GMC Member + Head Hayleys Group HR

5. Testing Candidates

5.1 Aptitude Tests

Aptitude test will be administered as and when required considering the role.

5.1.1 Aptitude tests will be as follows:

- General Aptitude Test
- Management Trainee Aptitude Test

5.2 Psychometric Tests

A psychometric test is a series of written or practical tasks which assess a clearly defined area of human behaviour. It measures less tangible or hidden qualities that cannot be directly experienced through our senses.

Psychometric testing would be administered as and when required considering the role.

6. Pre-Recruitment Formalities

6.1 Approval to Hire (ATH) Form

The ATH form is the source document to generate the letter of appointment. The ATH form will have to be approved by the respective Company/SBU Head of the respective sector.

Social Policies

The signed ATF form along with the CV, Personal Information sheet, Interview summary will be handed over to HR services by the Recruitment team to proceed with onboarding formalities.

X-1 GRADE

A candidate (who at present is in a grade lower than the evaluated grade of the job for which the interview is held) identified as not meeting the expected level (grade) to perform the job for which he/she was interviewed, a job offer may be made as a X-1 or X-2 situation. This means that the job offer is for a grade lower than the evaluated grade of the job and a fixed period of time up to 2 years shall be allowed for improvement. The decision to confirm in the evaluated grade is then based on performance where an appraisal is done in order to confirm staff in the evaluated position. The decision to offer an X-1 or 2 positions must be communicated to the candidate and agreed at the final interview.

X+1 GRADE

In instances where sourcing of candidates has been difficult, and the required competencies are identified in a person who has applied for a higher position, the Chief Executive Officer has the discretion to offer a higher grade than the evaluated grade of the job. In such instances a person is given the job on a "Personal to Holder" basis where the person is placed at a grade higher than the job and the job continues to be in the lower grade.

6.2 Reference and Credential Verification

A minimum of 2 reference checks inclusive of two former employers (if employed previously) should be

completed. Reference checks will be done on the telephone and would be documented. References are confidential and must be maintained in the personal file of the employee.

Social Policies

6.3 Communicating Salary and other Benefits

Once the candidate has been selected for the position the salary and other benefits will be communicated to the hired employee by the respective HR Head.

6.4 Medical Fitness Test

The appointment is subject to being classified as fit for service by the Group Medical Officer. It is also a condition of the employment that the Company shall be entitled to have the employee medically examined at any stage by the Group Medical Officer or a Doctor or Doctors of the Company's choice.

7. Engagement Formalities

7.1 Permanent Staff

7.1.1 Probation

The period of probation for all employees will be 6 months.

If an employee's performance is below the expected standards in relation to the JD or those who do not observe the staff regulations or other company policies must be terminated within the period of probation. However, in such instances it is necessary to keep a record of such incidents.

A probation period can be extended for a further period of 6 months. If this is done, it must be brought to the notice of the relevant staff member in writing, before the expiry of the initial probation period.

7.2 Contract & Other Staff

7.2.1 Contract staff

Employees will be hired on Fixed Term Contracts only for job roles that have a specific time duration defined for the completion of the job scope such as job roles involved in Projects and/or specific assignments.

7.2.2 Interns

Interns to be provided, a monthly allowance which will be paid to them during their internship. At the end of the internship a letter indicating the areas and training they received would be given to them. Duration of internship should not reach or exceed 12 months.

7.2.3. Hiring through Service providers

Hiring from service providers to the organisation will only be with the consent of the relevant service provider and with CEO/MD approval.

7.3 Rejoining of Resigned Employees

Employees who have had their employment terminated by reason of a disciplinary process shall not be considered for recruitment.

Employees who have left the company through a Voluntary Retirement Scheme (VRS) shall also not be eligible to rejoin any Company of the Hayleys Group.

Such employees can be considered for rehire only upon the completion of a reasonable time frame since the acceptance of the VRS as decided by the relevant Hayleys GMC member of the Sector and with the approval of the Chairman/Chief Executive of the group.

In the event of recruiting a previous employee to any Company within the Hayleys Group, the previous service period of that employee shall not be counted for any purposes.

8. Post Recruitment Documents

Once a local candidate is identified and selected a series of post recruitment formalities are carried out by the recruitment section.

Following are the documents that would be required in order to complete the above-mentioned formalities.

1. Birth certificate of the Employee
2. Birth certificate of Children (If any)
3. Marriage certificate (If any)
4. National Identity Card
5. Educational Certificates
6. Professional Certificates
7. Passport Size Photograph
8. Bank Account Details
9. Grama Sevaka Certificate (Non-Executive Grades only)
10. Police Report
(Non-Executive Grades only)

9. On-boarding

9.1 Personnel Administration matters including letters of appointment

It is encouraged for Sectors of the Group to obtain the shared services of the Group Human Resources Department for the administration of both executive and non-executive personnel files and related administration matters so that the Sector's Human Resources department could devote its time on strategic human resource interventions for its Sector. However in the event that the Sector

Human Resources Department were to manage the above mentioned personnel administration matters, such has to be in accordance with this policy and other applicable standard operating procedures that the sectors abide or which have been advised by the Group Human Resources Department.

9.2 Acceptance of Offer

On candidate request a Letter of Offer can be issued specifying details of remuneration and position. The candidate will be required to confirm the acceptance of the offer by returning the signed duplicate of the copy.

Subsequent to other onboarding formalities the comprehensive Letter of Appointment will be issued. The selected candidate shall be required to confirm acceptance of appointment by signing and returning the duplicate copy of the letter of appointment together with terms and conditions of employment as applicable to the relevant position.

9.3 Non-Acceptance of Offer

On non- acceptance of offer or silence of the candidate, The Company shall treat the offer of employment as rejected.

9.4 Unfilled Positions

All unfilled positions as a result of inability to find suitable candidates shall be reconsidered by the Company. It is Group policy that any such unfilled positions shall be kept open until a suitable individual with the required job specification is found.

Responsibility

The heads of each business sectors, along with the heads of each business units will be responsible to ensure this policy is valued and adhered to.

5. Learning and Development Policy

Purpose:

The policy is established with the objective of setting a framework of guidelines on Learning & Development of our employees pertaining to the following:

- To provide enhanced direction related to learning and development at Alumex PLC.
- As Learning and growth is an integral part of life at Alumex, our values are manifested through the philosophy of learning and growth of its people.
- Committed to ensure development and execution of learning initiatives that are aligned with continuous Learning and development of our people as a organisational strategy.
- Entrust individual responsibility to employees on their personal and professional growth.
- Leaders at all levels in the organisation are accountable for the growth and development of their people. Thereby, to provide opportunities for continuous learning and adapting capabilities

Scope:

Invest on a continuous basis in developing competencies of employees, whilst focusing on:

- Priority given for technical, professional, functional skills and leadership aspects.
- All learning & development aspects of Management and senior leadership of Alumex PLC.
- Personal development of all employees at Alumex PLC.

Social Policies

Core Content:

Learning & Development policy comprehensively covers guidelines pertaining to:

- Training needs identification
- Designing and delivery of required training programs
- Nominations & program participation
- Post training evaluation -Throughout the above stages of the learning & development cycle, vigorous involvement of senior management together with the Group HR- Learning & Development is mandatory for successful implementation of the complete learning process. References to the term "Management" in this policy shall always include the departments concerned unless expressly excluded for a specific reason, which shall be stated.

Learning & Development Procedure:

1. Training needs Identification

- Training needs identification of employees will be carried out on annual basis by respective sector HR teams.
- Main mechanism of identification of training needs will be through annual performance appraisal discussions.
- Through discussions with respective GMC members, CEOs and Directors of the respective Sector / company.
- Development needs will also be identified based on specific requirements of any special projects/ assignments.
- Talent and succession pool development is the responsibility of the Sector GMC member, in collaboration with sector HR team and Group HR.

2. Prioritising training and development needs

Respective cluster HR Head is responsible:

- To define and identify critical training needs of respective sector employees
- For compiling and validating critical training needs for their sectors.
- For identifying and compiling programme objectives and expected performance standards.
- For communicating collated & prioritised trainings needs of its employees in a structured format to the HR division on an annual basis.

3. Designing and delivery of Training Programmes

HR division will:

- Review, design and facilitate relevant training programmes to cater to identified specific training needs that are common for all clusters.
- Designing of training programs will be predominantly based on the identified specific development needs of employee including:
 - i) Expertise and recognition of selected trainers/ training institutes,
 - ii) A database of pre-approved Trainers/ Training partner institutions will be maintained by Group HR division.
 - iii) Discussions with identified parties will be held prior to making the decision to customise the programme, in order to meet expected training objectives of nominated participants.

- iv) respective sector HR team will be responsible to handle any other sector specific training programs.

4. Cost Allocation and Training Investments

- HR members are responsible in preparation of the budget and defining of other constraints for identifying potential development opportunities for their respective sectors.
- Our HR teams are required to keep the GHR team informed at the beginning of the financial year, on their specific budget allocations for overall learning & development upon completion of budgeting cycle.

5. Post Training Evaluations

- Feedback from participants will be gathered, reviewed and evaluated by the HR for necessary action.
- In the event of any non-conformity, the respective trainer/ training institute will be called for a discussion, to ensure quality and standards of the programs are maintained.
- Knowledge sharing should be done amongst peers within own dept. / company within a month of completing the training by the respective employee.

Responsibility

Our HR division will be responsible to ensure this policy is valued and adhered to.

6. Talent Management and Succession Planning Policy

Overview

Our company's Talent Management and Succession planning team will be adhered to The Hayleys Talent Management and Succession planning which will be an ongoing group wide process which identifies the competencies in order to develop and retain a talent pool of employees.

The process is conducted in order to ensure the continuity of business, immaterial of the changes in leadership, across all critical positions.

Objective

Alumex PLC's Talent Management and Succession planning is designed to be a focused and proactive process, which will enable Alumex to determine the competent talent pool in order to ensure the continuity of business, immaterial of the changes in leadership across all critical positions, across the Group.

- A process to preserve the information and knowledge within the organisation; in case of retirement, promotion or attrition.
- A tool for high performing individuals, at various designation levels will be able to take up the responsibility whenever necessary.
- To support the growth of Employee Engagement
- To reduce the recruitment cost

Eligibility Criteria

- Identified talent must have completed at least two Appraisal cycles.



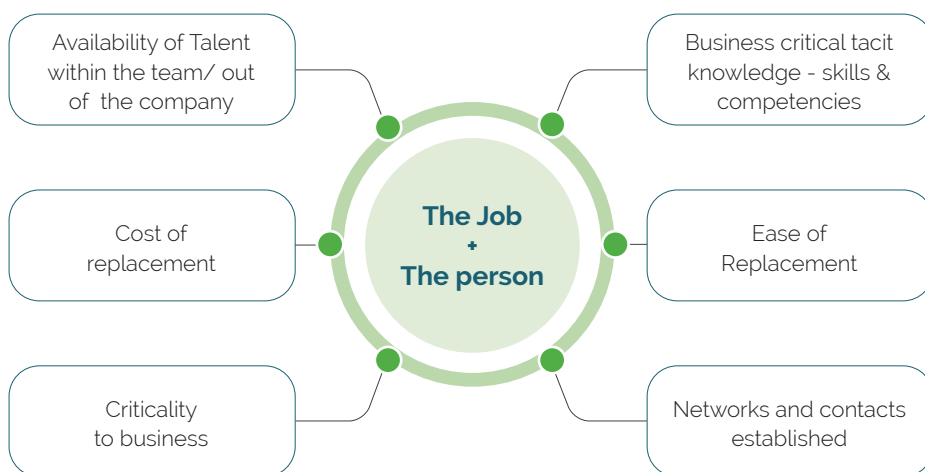
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The accountability lies between the BU Head and Relevant GMC member

The immediate Supervisor and BU Head will conduct the initial stage of identifying critical role(s). HR

Head is required to overlook the process.

HR Head will need to overlook the process and research the availability of Talent for each identified Critical Role.



Social Policies

2

Once the Talent Review meeting request has been sent by HR, the supervisor will receive a notification to complete a potential questionnaire for those who fall within the criteria of 3 & above for the Performance rating, by the Human Resources department.

This questionnaire is required to be completed prior to the Review meeting, as it collates information for the 9-box grid for those within the identified criteria. It is rated using a 1 - 5 Likert scale.

The questions in the system are as below:

- 1) The person is a strategic thinker
- 2) The person has the ability to lead others through influence, not just authority
- 3) The person is a creative problem solver
- 4) This person thrives on new challenges and delivers results
- 5) This person is a good fit within our culture
- 6) This person has an effective network; both internally and externally
- 7) This person is self-aware, and strives for both personal and professional development
- 8) This person recognises and leverages the potential in others

Based on the scoring the potential rating will be decided as shown below;

8 to 20 – Low

21 to 34 – Medium

35 to 40 – High

In addition to the Potential, Risk of Loss (likelihood of employee leaving – flight risk) and Impact of loss (impact to organisation if the employee leaves) ratings will also have to be provided on a High, Medium and Low rating scale. These will be direct inputs by the supervisor and further ratified at the Talent review committee.

Parallel to this, a 'best fit analysis' will need to be completed for those identified critical roles. This task is to be carried out by the BU Head, following the initial discussion of Critical Roles and Jobs at Risk identified with GMC member.

For each Critical Role identified, an expected benchmark will need to be filled in for the below seven criteria – model profiling. This is also the commencement point of the Succession Management module.

- 1) Competencies
- 2) Languages
- 3) Licenses and Certifications
- 4) Honours and Awards
- 5) Memberships
- 6) Degrees
- 7) Work Requirements

This will generate the 'best fit analysis' for each identified critical role. The 'fitting profiles' can be filtered to a percentage number the sector decides on.

The identified talent considered will be from two levels below the Identified critical role.

i.e. If the Critical role identified is of a General Manager level, those from Manager level upwards can be considered.

3

Talent Review Meetings must include BU Head/ COM member (as applicable), Immediate Supervisor, HR Head and any other invitees.

The employees are also slotted into the 9-box grid with Performance and Potential as the two axis where the top talent (mainly those who fall into the three quadrants of High Potential, High Performance; Medium Potential, High Performance; High Potential, Medium Performance) is identified.

Employees who fall into other categories such as low performance, high potential; Medium Performance, Medium Potential also need to be considered.

It is recommended that an average performance rating be utilised over the last 2 or 3 years for the performance axis. However, this is subject to the discretion of the respective Management team of the division/sector where a decision could be also taken to only consider the performance of the last year.

At this stage, successor identification and mapping occur.

In the case of other identified talents, which will not fall into Succession Planning, the Talent Profile need to be re-visited, reviewed and plans discussed to ensure these profiles are continuously developed and engaged.

4

The accountability of the process lies with the HR, and the coordination of the Succession Planning Team is required.

- Generally finalising of the successors will be with the involvement of the

respective GMC member, HR Head / Head GHR/ Head – GTD. However, depending on the seniority of the potential successor this can vary. For senior positions, the Hayleys Chairman and Chief Executive will also participate.

All potential successors at senior level in order to be confirmed will need to be forwarded to Hayleys Chairman and Chief Executive and approval obtained.

The HR Head is required to be present at this meeting, along with the below:

- 1) The jobs at risk
- 2) A snapshot of the dashboard of each identified talent

This discussion will be the decisive step taken prior to moving to the Assessment Centre. This step will also ensure that the process is conducted consistently across the group while facilitating cross- sector transfers.

5

The readiness level or the number of years required to reach the desired role needs to be indicated for each identified successor. The development plan (s) formulated have to be aligned to the readiness level time frame.

Conducting Assessment centres while optional is recommended as it helps sharpen the development of the identified successor.

The type of Assessments conducted will differ from those identified for Managerial Levels, and General Manager and above levels.

Following the Assessment process results, the GMC member of each respective sector will need to be updated on the outcome and the progression of the final Talent pool.

6

A customised PDP will be developed based on the assessment centre feedback and discussions, as well as input from the supervisor and the GMC member for the selected candidates. This PDP should be reviewed at least once a quarter.

The development of the PDP for sectors should lie in the responsibility of the HR Head, a training coordinator and the immediate supervisor.

The development of the PDP for Alumex PLC would be the responsibility of our HR division.

The PDP must include soft skills development programmes, and subject related programmes (as per the Business needs).

Our Company will seek the assistance of HR when developing the PDP.

A report of each PDP must be shared with:

1. The Identified Talent
2. GMC member
3. Head – HR/ The Succession Planning team
4. Head – GHR

These Development Goals can be added to the Talent Management profile of the individual.

7

An individual will be evaluated on a quarterly basis.

Those whom the PDP is assigned to will be responsible for the execution of the PDP, however the HR and Succession Planning coordinator is required to follow – up and assist in the process (facilitating and identifying/ nominating for relevant Trainings).

The Head- GHR, The HR Heads and the Succession planning team, will need to review the outcome of an evaluation at the end of each quarter.

The evaluation will be conducted amongst the HR Head and Immediate Supervisor.

At the end of the 2nd Quarter, each evaluation will be required to be discussed with the Head- HR and GMC member. Underperforming individuals will be highlighted during the 2nd Quarter Evaluation period and warned. The continuation of such individuals in the Successions Planning process will be determined by their performance, growth and efficiency by the end of the 3rd Quarter.

*Promotions may occur during the PDP; however, the PDP plan must be followed through until the end.

Social Policies

8

Once the IDP is completed, and if immediate promotion is not available, a strong retention plan must be placed.

i.e.: Involvement in a strategic project/
Retention Bonus

The HR Head is accountable for this and must be discussed with relevant GMC member.

Not only those identified for Succession Plans, but those identified as Top Talent could also be subject to Assessment Centres and Personal Development Plans formulated.

Continuous engagement, involvement in strategic projects and discussions to take place with all employees identified as top talent and successors to ensure s/he is motivated and focused.

Succession plans for each critical position needs to be reviewed every six months and necessary adjustments where relevant should be made.

Responsibility

The head of HR will be responsible to ensure this policy is valued and adhered.

7. Performance Management Policy

1. PURPOSE

To facilitate and promote the achievement of organisational business objectives through the effective management of employee performance.

2. SCOPE

The policy applies to all Executive & Managerial staff members of the Alumex PLC.

3. RESPONSIBILITY

NO.	JOB TITLE	RESPONSIBILITY
1	Employee	Adhering to the policy, process and procedures. Ensure one's goals are set within the stipulated time period
2	Immediate Supervisor	Adhering to the policy, process and procedures. Ensure subordinates goals are set and evaluations carried out within the stipulated time period
3	HR Division	Administration process and provision of management information
4	Management Committee Member / Managing Director / Head of the company	Long term commitment and continuous support to drive the policy in our company while recognising and reinforcing strong performance of employees

4. POLICY ADMINISTRATION PROCEDURE

4.1 Compliance with the annual performance appraisal process is measured as a corporate performance indicator.

4.2 Alumex PLC Performance Management System (PMS) evaluates the following components to which weightages are allocated in order to measure individual contribution to the company.

- Key Performance Indicators (KPI's): 80%
- Behavioural Competencies: 20%
- Organisation Values: (-)10%

4.3 KPI/Goal Setting

4.3.1 Individual KPI setting is based on the Balance Scorecard method where by employee performance is measured according to the following perspectives in order to ensure a holistic approach is used to measure employee performance. Required perspectives should include KPIs from following aspects:

- Learning and Growth Perspective
- Internal Business Processes Perspective

- Customer Service Perspective
- Financial Perspective

4.3.2 In certain instances it may not be possible for KPI's to be set based on the financial perspective of the balance scorecard. In such cases, the KPI's will be distributed among the other three perspectives.

4.3.3 The immediate supervisor and all employees of the company must ensure that the cascading and planning of specific KPI's for the following financial year must be completed annually by March

4.3.4 Goals of employees should include KPI's/ Goals set according to the SMART principal (Specific, Measurable, Achievable, Realistic, Time-bound), measures and evaluation criteria as agreed upon by the immediate supervisor and the employee.

Weightages need to be decided for each goal with the summation of such equalling to 100% for the entire goal plan (i.e. all performance goals)

4.3.5 Each goal needs to possess a measurement criterion on how the goal is to be achieved also detailing the level of performance i.e. the target that would constitute an expected level of performance, the quantum of increase(s) that defines beyond expectations etc.

4.3.6 KPI's of several individuals can be similar in nature but should be tailored to each individual based on job requirements.

4.3.7 Hayleys Group KPI's are permitted only if KPI's are set that require two or more people to accomplish the KPIs.

4.3.8 Assessing of KPI's will be carried out through a 5-point scale (1 being the lowest and 5 being the highest)

4.3.9 Competencies will be in line with the Alumex PLC Behavioural Competency Framework which specifies the level of proficiency required for the relevant Behavioural competencies by job level.

4.3.10 Assessing of Competencies will be carried out through a 5-point scale (1 being the lowest and 5 being the highest).

4.3.11 Organisation Values are evaluated by the immediate supervisor in a close ended manner where the supervisor states whether or not the respective employees possess the Alumex values or not. This

evaluation carries a (-) 10% weightage where possessing the values would be '0%' and not possessing would amount to (-10%)

4.4 Performance Monitoring

It is recommended that continuous feedback and monitoring takes place to ensure that performance observation is an ongoing activity. The immediate supervisors are encouraged to record all major performance related incidents on a continuous basis so that real time feedback can be given to employees.

4.5 Mid-Year Review

4.5.1 The immediate supervisor is responsible for scheduling a midyear review with the subordinate to discuss the progress made on the achievement of KPIs and any corrective action required.

4.5.2 Performance ratings are not communicated and only feedback on individual goals and overall performance is discussed. Validity of Goals could be revisited and necessary adjustments could be discussed with the employee and finalised.

4.5.3 The midyear review takes place 6 months after the start of the period of assessment.

4.6 Annual Assessment

4.6.1 Self-Appraisal:

At the annual assessment, the employee conducts a self-evaluation on one's performance in terms of the Goals set at the commencement of the year of assessment and the Behavioural Competencies aligned to the specific job level. It is very important that the employee provides justification with facts and figures for each of the ratings

provided. In addition, the employee should also indicate any training requirements he/she feels is required to execute the given job role.

Finally, overall comments also need to be provided summarising the contribution for the assessing year.

Supervisor Appraisal:

The Immediate Supervisor thereafter conducts the Supervisory appraisal for the employee on the Performance goals, competencies and values.

Taking note of the ratings and justification provided by the employee, the supervisor will make his/her assessment providing justifications for goals and competencies. Recommended training programmes will also be suggested for the employee in line with the job role. The assessment on whether the employee possesses the Alumex values will be made and finally the overall comments on the assessment year will be provided.

The supervisor enters all above and saves his/her entry on the system without submission until the next step is complete – the calibration review.

Once the Calibration is complete, the supervisor will adjust any ratings as applicable post Calibration review committee and submit the final review.

4.6.2 The annual assessment takes place in the period March-April for all Group companies other than in specific circumstances related to specific industries / countries.

4.6.3 All ratings should have sufficient documentation to substantiate the ratings.

Social Policies

4.7 Review of overall Performance Ratings / Rating Calibration reviews

4.7.1 A review committee consisting of Chairperson (Head of Company/ Department), Appraisers and representative from HR (to be decided depending on levels being discussed) in order to evaluate the performance ratings of all employees to ensure that the appraisal is carried out in a fair, impartial and accurate manner.

Final approval for all Executive and above Performance ratings has to be obtained from Alumex GMC member of the division.

4.7.2 The review committee meets after the immediate supervisor has completed the performance assessment of the employee and before the appraiser discusses the assessment ratings with the employee.

4.7.3 The performance rating is finalised only after the review committee members approve the ratings.

4.8 Feedback Session

4.8.1 Once GMC approval is obtained, a one-to-one feedback session

Takes place between the immediate supervisor (IS) and the employee. During this feedback, the IS will give his comments including the comments from the calibration review committee on the employee's performance over the course of the year of assessment. The conversation will also entail areas of development and behaviours that should continue; commendation for achievements and highlights; the employee's aspiration and career path in the short to medium term and formulate any development action plans where relevant.

It will be required to place on record the details of this conversation and the date it took place.

4.9 Modification/ Amendments to KPI's

Circumstances may arise which require changes to the set KPI's due to unforeseen factors.

Guidance from the Human Resources Department could be obtained; however, listed below are procedures for the most common extenuating circumstances.

Modification/ removal of KPI's may be considered under the following conditions. The new KPI's would need the next higher-level supervisor's approval before being adopted.

4.9.1 Change in business plans leading to a change in the organisational/ individual KPI's, to be decided / agreed upon at GMC Members/ CEO / Senior leadership level

- It is the responsibility of the immediate supervisor to explain to the employee regarding the modification/ removal of the KPI.
- If considerable effort has been made by the employee to achieve the KPI, the employee should be rewarded for the progress made on the achievement of the KPI up to the point of modification of the KPI.
- If the KPI is to be removed and considerable effort has not been made by the employee to achieve the KPI, then the weight attached to the KPI could be proportionately redistributed amongst the other KPI's.

4.9.2 Transfer to a new role under the same/ new supervisor

- If 4 months of continuous supervision has been performed in the previous role

The former supervisor will complete a performance appraisal on the employee using the set out procedure in this policy.

In the case of a change of supervisor, it is the responsibility of the department head to ensure that all appraisals are completed and submitted to the HR department before a supervisor is no longer in the employee's chain of command.

The new supervisor will begin the appraisal process once the previous supervisor has submitted the employee's performance appraisal documents. In the event that the new supervisor has supervised for a period less than 4 months, higher weightage should be given to the previous supervisor's appraisal.

- If 4 months of continuous supervision has not been performed in the previous role

The previous supervisor will supply the new supervisor with all documentation on the employee and provide the new supervisor with a "mock" evaluation of performance and KPI attainment (if applicable) to date.

4.9.3 Change of Supervisor

- If 4 months of continuous supervision has been performed

The former supervisor will complete a performance appraisal on the employee using the above procedure if there is at least 4 months of continuous supervision.

It is the responsibility of the department head to ensure that all appraisals are complete and submitted to the HR department before a supervisor is no longer in the employee's chain of command.

The new supervisor will begin the appraisal process once the previous supervisor has submitted the employee's performance appraisal documents. In the event that the new supervisor has supervised for a period less than 4 months, higher weightage should be given to the previous supervisor's appraisal.

- If 4 months of continuous supervision has not been performed

The previous supervisor will supply the new supervisor with all documentation on the employee and provide the new supervisor with a "mock" evaluation of performance and KPI attainment (if applicable) to date.

Responsibility

HR division of our company will be responsible to ensure this policy is valued and adhered.

8. Anti-Sexual Harassment Policy

1. Purpose

Alumex PLC is committed to creating a healthy working, inclusive environment that enables employees to work without fear of sexual harassment. Any form of sexual harassment can adversely impact both individual and organisational performance.

Alumex PLC will not tolerate any form of sexual harassment of its employees in keeping with its Values and considers any act of sexual harassment as misconduct, entitling the company to take appropriate disciplinary action, including termination of employment. Sexual harassment is a criminal offence under the Penal Code of Sri Lanka.

Sexual harassment in the workplace can take many forms. It can be obvious, direct or subtle and can include unwelcome physical, verbal or non-verbal behaviour. It can also affect either sex.

Definition of Sexual Harassment

Conduct which is unwelcome, unsolicited, unacceptable, unreasonable and offensive to the recipient of an overtly or covertly sexual nature, affecting the dignity of women and men at work, including the conduct of superiors, colleagues and subordinates.

(Vide Code of Conduct and Procedures to Address Sexual Harassment in the Workplace, a Guideline developed by the ILO and the Employers Federation of Ceylon)

It is important to note that behaviour, considered acceptable in one context, may be construed as harassment in another. Depending on whether the behaviour is welcome or not, any of the following could amount to sexual harassment:

- Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion or other benefits
- Material that is sexist, sexually explicit, etc. displayed publicly, circulated or distributed on a computer, fax machine, mobile phone or any other device
- Verbal abuse or comments that put down or stereotype people generally, or an individual particularly, because of their gender.
- Sexually suggestive or explicit verbal abuse, gestures or comments that would create an uncomfortable atmosphere for the individual
- Unwanted physical contact (ranging from unnecessary touching to serious physical assault)

2. Scope

To firstly create a climate where employees feel confident that sexual harassment will not be tolerated, and where they feel comfortable speaking out about harassing situations. Secondly all members of the organisation must know what the consequences of sexual harassment are, and what to do if they become aware of sexual harassment.

Thirdly continual training and education are essential to maintaining an atmosphere of mutual respect.

3. Procedure to be adopted in the event of sexual harassment

3.1 If any employee of the company feels that he/she is being sexually harassed, the employee could:

Social Policies

3.1.1 Inform the person harassing to stop. This will convey to that person that the employee is embarrassed, humiliated, demeaned, or otherwise bothered by what they are doing or saying. Often, a person may not be aware that her or his behaviour is bothersome, and will change the behaviour once they realise this

3.1.2 This could be done directly or in writing. If it is in writing the letter should be dated and copy to be preserved. If it is conveyed to them directly a trusted friend should be informed of what was done and why.

Social Policies

3.1.3 The employee should keep notes of what the bothersome behaviour was, the date it happened, how they felt and what they did about it, and who else was present, if there were witnesses.

3.1.4 If the harassment stops, no further action may be necessary.

3.2 If the harassment continues, the employee could:

3.2.1 Take formal action by making a complaint verbally or in writing (by letter or email) to any member of the appointed Committee within ten (10) days following the incident unless there are compelling reasons for delay

3.2.2 Directly contact verbally or in writing to any member of the External Committee (Ombudsman) appointed by Alumex for accepting complaints to maintain confidentiality

3.3 Once a verbal or written complaint is received:

3.3.1 The Committee or Ombudsman will maintain a register to endorse the complaint received by them with copy to Chairman and Chief Executive and keep the contents confidential, if it is so desired, except to use the same for discreet investigation

3.3.2 The Committee or Ombudsman will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case

3.3.3 At the first meeting, the Committee members or Ombudsman shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint

3.3.4 Thereafter, the person against whom the complaint is made may be called for a deposition before the Committee or Ombudsman and an opportunity will be given to him/ her to give an explanation, after which, an "inquiry" shall be conducted by the Committee appointed and concluded.

3.3.5 The parties are entitled to be represented through a colleague at work if required

4. The Inquiry Process

4.1 The Committee shall immediately proceed with the Inquiry and communicate the same to the Complainant and person against whom complaint is made.

4.2 The Committee shall prepare and hand over the Statement of Allegation to the person against whom the complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.

4.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

4.4 If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.

4.5 If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.

4.5.1 The Committee shall call upon all witnesses mentioned by both the parties.

4.6 The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

4.7 The Committee shall complete the "Inquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the HRD.

4.7.1 The decision of the Committee will be conveyed to the parties in writing

4.8 Where it is determined that there has been cause for complaint, the Committee shall recommend disciplinary measures, including and not limited to dismissal; and

or counselling and take steps to create an environment conducive to work

4.9 The HRD will direct appropriate action in accordance with the recommendation proposed by the Committee.

4.10 Management would take all possible measures to ensure that the complainant would not be penalised for making the complaint. Further if such an event occurs to make the complainants' life difficult, the management would take disciplinary action against those parties making the complainants life difficult.

5. Unsubstantiated complaints

If an employee, in good faith, files a harassment complaint that is not supported by evidence gathered during an investigation, that complaint will be dismissed, and no record of it will be put in the accused harasser's file. As long as the complaint was made in good faith, there will be no penalty to the person who complained, and no record in his/ her file.

6. Complaints made in bad faith

In the event that a complaint was made in bad faith--in other words, the person making it had absolutely no basis and deliberately and maliciously filed the complaint – that person will be disciplined and a record of the incident will be put in her or his file.

7. Action against harassers and those making complaints in bad faith

An employee found guilty of sexual harassment will be subject to one or more of the following forms of discipline, depending on the severity of the harassment:

Similarly, an employee making complaints in bad faith will be subject to one or more of the following forms of discipline.

7.1 a written reprimand;

7.2 a suspension, without pay;

7.3 a transfer, if it is not reasonable for the people involved to continue working together;

7.4 dismissal (this list is not exclusive or exhaustive)

The harasser will also be required to attend an anti-harassment training session

8. Right of Appeal

8.1 If a party is not satisfied with the decision of the committee, the party may appeal to Managing Director of Alumex PLC further to Hayleys group HR/Chairman and Chief Executive of Hayleys PLC in writing within 10 days of the decision of the Committee who will respond within 14 days.

8.2 If no appeal is made within 10 days, the decision of the Committee shall be final and conclusive.

9. Committee

9.1 A five-member committee will be at all times constituted to consider and redress complaints of Sexual Harassment.

9.2 The Committee shall constitute of the Head of Group HR and 2 Group Management Committee members, and two more functional leaders of the Alumex PLC team. Fair gender representation must be retained with a minimum of two members of either gender. In the event the required gender representation is not possible through the above constitution, the Head of HR will discuss with other committee members and identify suitable person/persons to join the Committee with the approval of the Managing director and Executive director of Alumex PLC. In this event, the number of committee members will be increased.

9.3 A quorum of 3 members is required to be present for the proceedings to take place ensuring fair gender representation (at least one member representing either gender)

9.4 A committee member shall cease to be a member of the Committee forthwith on the occurrence of any of the following events:

- Resignation from the Committee by written notice to the Company
- Removal by notice in writing by the Managing director
- Ceasing to be an employee of the company
- On death or any legal incapacity

9.5 Any vacancy can be filled by the recommendation of the Managing director and Executive director of Alumex PLC. The Committee at its discretion from time to time may review and propose amendments to the policy which will take effect if approved by the Managing director and Executive director of Alumex PLC.

9.6 The Committee at its direction from time to time may review and propose amendments to the policy which will take effect if approved by the chairman and Group Chief Executive. Hayleys PLC.

9.7 If the accusation is against a Committee member he/she will immediately step down from the Committee and the Chairman and Group Chief Executive, Hayleys PLC will appoint a suitable temporary replacement Committee member. In the event the member is cleared of all charges, he/she will be immediately reinstated and the temporary member will step down.

Social Policies

10. The Ombudsman

10.1 The Group Chief Executive may nominate up to 05 persons who are not employees of the Company to function as Ombudsman for the purposes of implementing this Policy

An Ombudsman shall be nominated for a term of 01 year at a time and shall be eligible for re-nomination.

10.2 An Ombudsman shall cease to hold office on the occurrence of any of the following events:

- a. resignation in writing by the Ombudsman,
- b. removal by the Chief Executive with written notice.

11 Other

11.1 "Employee" means any person on the permanent cadre of the Company, those on contract, internship, temporary, part time or working as consultants.

The details of the incumbent Committee are available on the Intranet and updated as required upon changes in the membership.

9. Whistleblower Policy

1. Purpose

Alumex PLC is committed to the highest standards of ethical, moral and legal conduct in operating its businesses. In line with this commitment, this Whistleblower Policy is primarily to provide a mechanism for employees to raise concerns where the interest of the organisation is at risk and is expected to provide an assurance that employees raising such concerns will be protected from reprisals and victimisation. This Policy applies to all individuals working at all levels (both permanent and contract) within Alumex PLC.

2. Definitions

The following words and terms as used in this Policy shall unless the context clearly requires otherwise, have the respective meaning set below:

1.1 'Committee' shall mean the committee constituted under this Whistle-blowers Policy to consider and redress concerns raised by a Whistleblower.

1.2 'Company' shall mean the Alumex PLC to which the concern raised under this Policy is related.

1.3 'Management' shall mean those persons that are in a managerial position in a Company who can reasonably be regarded as having the authority to make an initial assessment of the concern/ allegation made by a Whistleblower.

1.4 'Policy' shall mean this Whistleblowers' Policy

1.5 'Whistleblower' or 'Complainant' shall mean a person who raises a concern and/ or allegation under this Policy

3. Scope

This Whistleblower Policy is intended to cover concerns raised by staff on matters such as;

- Incorrect financial reporting;
- Financial fraud;
- Unlawful or improper conduct;
- Breach of the Code of Business Conduct, Values and other Policies of the Company;
- Any other improper activity that may have a negative impact upon the ability of the Company to achieve its corporate objectives and which may cause damage to its image and reputation

This Policy does not require the Whistleblower to prove the truth of the allegations made. Whistleblowers are required to raise such allegations in good faith and in an independent and unbiased manner. The Whistleblower may also need to provide sufficient information for the Management to take appropriate steps.

Where a genuine concern is raised under this Policy, the Whistleblower shall not be at risk of suffering any form of victimisation or retribution from the Company. However allegations in bad faith may result in disciplinary action.

A Whistleblower is able to lodge concerns confidentially and/or anonymously.

Management would take all possible measures to ensure that the complainant would not be penalised for making a complaint. Further if such an event occurs, appropriate disciplinary action will be taken against the parties involved in making the complainants' life difficult. Accused will be

treated as genuine until the proceedings are concluded and a decision is made. The management will take appropriate actions if needed in the event any harassment is levelled against the accused.

4. Procedure to raise a concern

4.1. Concerns may be raised face to face or by telephone or in writing via a dedicated e- mail address or in writing by both named and anonymous persons. A written report will require the background and history of the issue at hand, in chronological order together with the reasons pertaining to the concerns expressed.

4.2. These concerns shall be raised with the Chairman or the Managing Director of Alumex PLC

4.3. Advice or guidance with regard to the manner in which concerns as coming within this Policy should be raised can be obtained from the Deputy General Manager HR and Administration .

5. Management Response

Once a concern is raised, the following steps will be taken:

- a. Receipt will be acknowledged where identity is disclosed
- b. Management will proceed to make an initial assessment and decide on one of the following actions as appropriate.
 - To be investigated internally by an internal inquiring committee appointed in the manner described herein under;
 - To be referred to the Police or any other legal authority where such concerns discloses information of a criminal nature;
 - To be referred to the internal or the external auditors;

- To be the subject of an independent inquiry
- c. In the event the Management decides to conduct an internal investigation through the internal inquiring committee as laid down in this policy, a decision would be taken and communicated to the relevant parties within 3 month time from the date the inquiry commenced.
- d. The Whistleblower will be provided with feedback on actions taken if s/he has so requested. However, it must be noted that the Management may not be able to make full disclosure where an infringement of a duty of confidentiality to another person could occur, or where the information is sensitive so as not to be able to make full disclosure which otherwise would have been made.

6. The Internal Inquiry Process

6.1 Where an initial concern/allegation is made, the Management will discuss the matter with the Complainant. If s/he has a personal interest in the matter, s/he will be required to disclose this at the onset. Where the concern/allegation falls more appropriately within the Grievance Procedure s/he will be advised accordingly.

6.2 The Committee appointed in terms of clause 7 herein, shall immediately proceed with the enquiry and communicate the same to the Complainant where necessary and to the person/s against whom the concern/ allegation is made.

6.3 The Committee shall prepare and hand over the statement of allegations to the person against whom the allegation(s) is/ are made and give him / her an opportunity to submit a written explanation if s/he so desires within 7 days of receipt of the same.

6.4 If the person/s against whom the concern/allegation is made desires any witness/es to be called, s/he shall communicate in writing to the Committee the names of witness/es whom s/he proposes to call.

6.5 The Committee shall call upon all witnesses mentioned by the person/s against whom the concern/allegation is made and any other persons that the Committee may wish to obtain statements or evidence from.

6.6 The Committee shall provide every reasonable opportunity to the person/s against whom the concern/allegation is made, to defend his/her case.

6.7 The Committee shall complete the "Enquiry" within a reasonable period but not beyond three months and communicate its findings and its recommendations in writing for the action to the Human Resources and Administration Department of Alumex PLC.

6.8 The decision of the Committee will be conveyed to the Complainant and the person/s against whom the concern/ allegation is made

6.9 Human Resources and Administration Department will direct appropriate action in accordance with the recommendations proposed by the Committee.

7. Internal Inquiring Committee

7.1 The Committee shall constitute of the Managing Director, Chief Financial Officer, Deputy General Manager Human Resources and Admin, Compliance Officer, the Secretary to Managing Director and the Senior Manager Quality Assurance.

7.2 The Committee would include at least 2 male/2 female members to ensure fair gender representation. In the event

Social Policies

the require gender representation is not consistent in the internal inquiring committee, the Deputy General Manager Human Resources and Admin to discuss with other committee members and identify suitable person/persons and include in the committee with the approval of Chairman of Alumex PLC. In this event, the number of committee members will be increased.

7.3 A quorum of 3 members is required to be present for the proceedings to take place. The quorum should at least consist of one male/ one female member to ensure fair gender representation.

7.4 A committee member shall cease to be a member of the Committee forthwith on the occurrence of any of the following events:

- Resignation from the Committee by written notice to the Company
- Removal by notice in writing by the Managing Director of Alumex PLC for just and reasonable cause
- Ceasing to be an employee of the company
- On death or any legal incapacity
- If the member of the Steering Committee becomes an accused or has a direct involvement of the complaint

7.5 Any vacancy can be filled by the Committee on the recommendation of the Managing Director of Alumex PLC.

7.6 The Committee at its discretion may from time to time review and propose amendments to this Policy which will take effect after concurrence is received by the Chairman of Alumex PLC

7.7 If the complaint is against a committee member or if there is a conflict of interest that shall be known before or at any time during the inquiry with any committee member he/she will immediately step down from the Committee and the Managing Director of Alumex PLC will appoint a suitable temporary replacement committee member. In the event the member is cleared of all charges, he/she will be immediately reinstated and the temporary member will step down.

Social Policies

1.1 Human Rights Policy

Human Rights outline and focus on protection to people from severe political, legal, and social abuses.

Commitments to stakeholders

Employees: We treat all of our employees with respect and dignity and promote diversity in the workplace. Our aim to achieve uniform application of relevant principles underlined in the Universal Declaration of Human Rights is derived from our commitment to respect the rights of our employees, which include labour and working conditions. We are committed to train our employees to be aware of, respect and protect human rights in the workplace and in the local communities directly impacted by our operations.

Business Partners: Our commitment applies to workers directly engaged by the company and workers engaged through third parties to perform work related to core business processes for a substantial duration (contracted workers operating within company premises as well as suppliers, joint venture partners and clients/customers), through proactive engagement, monitoring and contractual provisions.

Local Communities: Where relevant, we engage with local communities on any

actual or potential human rights impacts of our operations, which also include land and property acquisition and security arrangements. Alumex practices human rights in accordance with the customs, cultures and values portrayed by these communities.

Provisions on human rights

Fair Treatment

We provide equality of opportunity and treatment for the purposes of eliminating discrimination based on race, colour, gender, sexual orientation, gender identity, religion, political opinion, nationality, social origin and status, disability, age or other status of individuals unrelated to their ability to perform work. Salaries are on par across all positions at the Group, sans any gender bias. Salary distinctions are based solely upon factors such as performance and market comparisons for the relevant skill group. Alumex aims to pay competitive wages based on local market assessments.

Non-harassment

Alumex commits to promote a work environment free of any form of workplace harassment including physical, verbal, sexual or psychological harassment, abuse, and threats, as defined by the laws of each country in which we operate. To protect workers against such acts, Alumex has implemented prevention policies, facilitates open communication, provides training, and allows workers to report incidents of harassment to a complaint mechanism that fully investigates the reports and responds accordingly.

Abolishing Child, forced and compulsory Labour

In Sri Lanka, the law defines children as below the age of 14 years. Alumex PLC opposes child labour, does not employ any person under the age of 18, and works with business partners to ensure that zero instances of child labour are recorded in

the supply chain as defined by national laws. We oppose all forms of forced or compulsory labour and work hand in hand with subcontractors and suppliers to ensure illegal forms of employment are eradicated.

Hours, wages and leave

Alumex PLC works within the standards set by national law and respects the standards set by the International Labour Organisation (ILO). We provide a living wage that enables workers to meet the basic needs of themselves and their dependents, ensures that workers are provided leave in accordance with national standards and ensures that all workers have an official employment status.

Freedom of association/collective bargaining

Alumex PLC believes in employees engaging in dialogue with the company on any issue they may wish to voice and seek redress on.

Promoting health and safety

Alumex PLC commits to providing safe and healthy working facilities and takes appropriate precautionary measures to protect employees from work-related hazards and anticipated dangers in the workplace. Safety precautions depend upon and are relevant to the industry, company concerns and the needs of vulnerable workers and meet or exceed the laws of each country in which we operate. Alumex PLC ensures that workers are provided with the protective equipment and training necessary to perform their tasks safely, and are actively involved in health and safety efforts.

1.2 Health & Safety Policy

Alumex PLC is committed to maintaining the highest standards of health and safety across its operations, thereby providing a safe and injury-free working environment for all employees. This guideline serves as

the minimum standard on health and safety management which have a higher level of vulnerability to health and safety risks are encouraged to implement more stringent practices reflecting sector-specific risks.

Alumex ESG strategies relating to management of health and safety, our targets and annual key performance indicators are set out under Health and Safety Strategies, Targets & KPIs forms an integral part of this standard.

Commitment

We seek to prevent all accidents and occupational diseases across our operations, thereby ensuring the protection of all our employees. In driving towards this objective, we are committed to:

Maintaining hygienic, safe, and healthy working conditions, machinery and equipment and provide the necessary instructions and training that is required for this purpose.

Ensure compliance to all health and safety laws, rules, regulations, relevant international standards, and client requirements. Also encouraged to obtain the ISO 45001: 2018 Occupational Health & Safety Management System.

We will seek to proactively engage in hazard identification and risk assessment and define subsequent corrective actions to effectively control health and safety risks in the workplace.

We are encouraged to educate and provide relevant health and safety training to employees, which in turn will nurture a culture of safety in the organisation and empower employees to avoid unsafe situations. All employees should also take reasonable care of their own health and safety whilst at work and fully co-operate with the company in all health and safety related initiatives.

We will ensure that contractors, service providers and other third parties entering the Group's sites and facilities are made sufficiently aware of the applicable health and safety practices in place and are equipped to carry out their tasks safely.

Drive continuous improvements in occupational safety and health management through ongoing communication, training and driving towards performance targets.

Ensuring the 100% complete and accurate reporting of relevant health and safety data on a timely basis following the set reporting requirements of the GRI Standards.

This policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practice

1.3 Procurement Policy

Alumex PLC has developed deep relationships across supply chains, both locally and internationally. The Company is committed to ensuring that procurement activities deliver a competitive advantage while generating sustainable value across its supply chains. This guideline serves as the minimum standard on procurement practices and the Company is committed is also committed to aligning procurement practices with strategic aspirations and industry best practices.

We seek to propagate sustainable practices and drive the creation of responsible value, while mitigating potential risks across our supply chains. We are therefore committed to, Following a formal and structured process for supplier selection that is based on objective and transparent criteria, free from any form of bias, discrimination and/or personal interests. Supplier due diligence should include criteria related to environmental, social and governance

Social Policies

performance The evaluation criteria will contain the following at a minimum

- Product specifications
- Price and payment flexibility
- Financial stability
- Safety and quality
- Technical and innovation capabilities
- Social and environmental compliance

The Company will carry out supplier audits on a regular basis, ensuring continued compliance to quality standards as well as social and environmental practices.

Implementing suitable mechanisms to identify, manage, mitigate, monitor and report ESG risks across the supply chain

Effective and appropriate segregation of duties within all procurement functions to prevent possible frauds

Proactively engage with suppliers and implement long-term supplier development programs to enhance capabilities and capacity to ensure alignment to the Company's long-term needs. Development programs will be designed and implemented based on specific supplier strategies and should encompass the following as a minimum:

- The Program should be structured based on clearly identified ESG benefits for the supplier and Alumex PLC
- Resource allocations should be determined on an annual basis, including financial, human and other resources
- The Company should formalise program through suitable MoUs, project plans and supplier agreements among others

Proactively pursuing alternative local counterparts to foreign suppliers, with the aim of increasing the percentage spend on local procurement, thereby increasing local value addition.

Ensuring the 100% complete and accurate reporting of relevant procurement and supply chain related data to Hayleys Group ESG on a timely basis following the set reporting requirements of the GRI Standards and Hayleys' Cube reporting.

Aligning with the Hayleys ESG strategy this policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practices.

1.4 Customer Management Policy Standard

The Alumex PLC caters to a global network of retail and B2B customers. We aspire to be the most preferred and trusted choice of our customers across all our sectors and are committed to achieving this goal through a unique value proposition which exceeds the expectations of our customers. This guideline serves as the minimum standard on customer relationship management which should adopt and a formal promise to our customers representing our commitment to fulfilling their needs.

Alumex ESG strategies relating to customer management, our targets and annual key performance indicators are set out under Customer Management Strategies. Targets & KPIs forms an integral part of this standard.

Commitment

We aspire to delight our customers through superior product quality and excellent service which meets or exceeds their needs

and expectations. In achieving this goal, we are committed to,

Nurturing customer relationships that are based on trust and mutual respect through developing long- term partnerships. We should seek to build customer relationships centering on value propositions underpinned by innovation, responsible production/marketing, customer service and satisfaction.

Maintaining 100% compliance to relevant laws and regulations relating to customers, including health and safety aspects of products/services, marketing and product labelling among others.

Ensuring that customers receive all relevant information about our products/services and fully understand the terms and conditions relating to each product they obtained from the company.

Comply with all relevant ESG requirements set out by customers and implement a mechanism to ensure continued compliance with the same.

Carry out customer satisfaction surveys at least on an annual basis, thereby obtaining feedback on critical aspects including product quality, service, ease of transactions and reliability among others.

Implement a quick and effective mechanism for customers to present their grievances and disputes. A systematic and clear process should be implemented to address and resolve such complaints within a reasonable period of time.

Ensuring the 100% complete and accurate reporting of relevant customer related data to Hayleys Group Sustainability on a timely basis following the set reporting requirements of the GRI Standards and Hayleys' Cube reporting.

1.5 Community Relationships Management Policy

Standard

Alumex recognises that its 'social license to operate' is an important prerequisite in ensuring the continuity of its businesses and managing environmental and social risks. It ensures legitimacy of the business from a community perspective, provides assurance to shareholders that social risks are identified and managed and preserves the company's reputation in times of crisis. For Alumex, the deep-rooted relationships it has nurtured with communities through its extensive reach, also allows it to drive meaningful change in these communities, supporting socio-economic progress and sustainable development.

Alumex ESG strategies relating to community engagement and development, our targets and annual key performance indicators are set out under Community Partnerships Strategies, Targets & KPIs forms an integral part of this standard.

Commitment

We seek to nurture ethical, transparent, and mutually beneficial relationships with the communities in which we operate. This is to be achieved through the following:

Develop and execute a community relations strategy which reflects its' social goals and the expectations of its' communities.

Implement credible and effective community grievance mechanisms which enable complaints and concerns to be identified and addressed in a timely manner. Community stakeholders made aware of the grievance process through suitable signposting, the corporate website, and other channels of community dialogue.

Show sensitivity to the culture, traditions, customs and social norms of each country and region in which we operate.

Actively engage in strategic community development initiatives broadly focusing on the key areas of education, health and well-being, livelihood development, religion, and culture. Initiatives should be formulated and driven primarily at Sector level based on identified community needs. Adequate financial, and human resources should be allocated for project execution. Certain significant projects may also be driven by the Hayleys Sustainability Unit.

The progress of all projects shall be monitored periodically, through impact assessments, audits, feedback from beneficiaries and independent third parties (where necessary) to ensure that program objectives are met.

Encourage and reward employee volunteerism, thereby recognising employee involvement.

Build partnerships with regional community groups, NGOs, and local governments.

Ensuring the 100% complete and accurate reporting of community project related information to Hayleys Group Sustainability on a timely basis following the set reporting requirements of the GRI Standards and Hayleys' Cube reporting.

Governance Policies

1. Policy on anti corruption and anti bribery

1. Purpose

The purpose of this policy is to:

- Define core principles: It outlines the Alumex PLC's stance on bribery and corruption.
- Assign responsibilities: It clarifies the duties of stakeholders (including employees, suppliers, and customers) in adhering to the policy.
- Ensure compliance and provide guidance: The policy ensures adherence to all relevant anti-bribery and corruption laws and regulations and assists employees and other Company stakeholders in understanding and addressing related challenges.

2. Policy Statement

Alumex PLC is committed to conducting its business activities with integrity and in an ethical manner.

Alumex PLC recognises the importance of zero tolerance for bribery and corruption which has become a serious global issue;

Alumex PLC recognises the damage caused to societies and individuals globally due to bribery and corruption;

The Alumex PLC recognises that bribery and corruption undermine the rule of law, leads to violation of human rights, distorts markets, and allows organised crime, terrorism and other threats to human security thrive and flourish;

Having a global footprint, the Alumex PLC continues to strengthen its overseas businesses and recognises the need to be aware of international compliance standards. Therefore, the following information is regarded as important:

- There is a significant increase of legislation around the world intended to create, or extend the reach and enforcement of anti-corruption laws
- It is critical for Alumex PLC to implement strong compliance measures in order to
 - Protect themselves from liability
 - Preserve interests of stakeholders
 - Minimise disruption to business
 - Protect corporate reputation

The Alumex PLC Bribery and Anti-corruption Policy is implemented with the objective of:

- Setting out the Alumex PLC's core principles on bribery and anti-corruption;
- Setting out the duties and responsibilities of the Alumex PLC's Chairman, Directors, direct and indirect employees, suppliers, customers and other similar persons with regard to complying with this Policy;
- Ensuring compliance to all applicable laws and regulations relating to anti-bribery and corruption;
- Providing guidance and assistance to stakeholders on how to face challenges and issues that they may face due to bribery and corruption relating to any business and other matters relating to the Alumex PLC;

Commitments

The Alumex PLC is committed to:

- Upholding the Anti-Corruption Act No. 9 of 2023 as amended from time to time
- Upholding laws relating to bribery and anti-corruption in all the countries in which the Company operate

- Upholding the 10 principles of the United Nations Global Compact (UNGC)

This Policy has been adopted by the Alumex PLC Board.

3. Definitions

Bribery is the direct or indirect offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Advantages includes money (in digital or virtual form) or any gift, loan, fee, reward, commission, valuable security or other property, interest in property or sexual favour. The intention of a bribe is to influence a person's actions or decisions in order to obtain an undue advantage or refraining from acting in the exercise of his or her official duties.

Corruption is defined as the abuse of entrusted power for private gain.

4. Applicability of this Policy

The Alumex PLC Bribery and Anti-corruption Policy (This Policy) is applicable to the Chairman and Board of Directors of Alumex PLC and all its subsidiary companies including all its employees and agents, residing or operating in Sri Lanka and in overseas locations.

This Policy is applicable to all Alumex PLC business operations whether in Sri Lanka or in any other overseas locations on sea or land.

This Policy will be made available to our contractors, indirect employees if any, suppliers, distributors, advisers, contractors, consultants and all third-party service providers (Partners) through the Hayleys companies' websites. Directors and Employees shall ensure that all contractual agreements and arrangements with our Partners shall include reference to

this Policy with the objective of complying with the provisions of this Policy.

Reference to the terms 'You' and 'Your' in this Policy will be applicable to all those individuals or organisations to whom a part or the entirety of this Policy is applicable to.

Reference to a 'Third Party' in this Policy means any individual or organisation that You come into contact with or deal with during the course of Your role, including but not limited to potential customers, competitors and organisations in the public sector, such as governments, public agencies and government-owned or controlled commercial enterprises.

5. Policy Governance and Maintenance

Responsibilities, and monitoring compliance of this Policy

The Directors of Alumex PLC and subsidiaries, and where applicable associate director boards, will have the overall responsibility for the promulgation of this Policy in support of its bribery and anti- corruption commitments and in compliance with its legal and ethical duties.

The Chief Financial Officer will be responsible to ensure that necessary procedures are in place to monitor compliance with this Policy and shall so monitor.

The Chief Financial Officer shall be responsible for drawing up operating procedures required for compliance with this Policy.

Monitoring and reviewing of this Policy

The Chief Financial Officer in conjunction with relevant personnel, will at least once a year monitor and review the implementation of and compliance with

this Policy. This review will take account of any changes in laws, changes in the Alumex PLC organisations and businesses and new areas of risk.

Alumex will periodically undertake internal/external appraisals including independent audits relating to this Policy and the procedures drawn and implemented under this Policy in order to provide assurance that they are being complied with and remain effective in countering bribery and as necessary enhance their effectiveness.

6. Compliance with this Policy

The prevention, detection and reporting of bribery and corruption in any form is the responsibility of all Directors and Employees. The Alumex PLC Whistleblowing policy shall also facilitate any reporting under this Policy. Where any Director or Employee violates this Policy, such individual may face disciplinary action which may result in termination.

Where Our Partners violate this Policy, Alumex PLC having contractual relationships with such Partners, will seek to terminate the contractual relationship in accordance with the terms of the relevant contract. The same will apply to any Third Party with whom any contractual relationships exist.

Non-compliance of this policy should be raised /communicated immediately through defined reporting channels and subsequent investigations will be conducted confidentially.

Gifts, hospitality and other promotional expenses may be a breach of this Policy.

Gifts, hospitality related invitations, events and other promotional expenses offered or accepted by Directors and Employees may not always be a form of bribery.

Alumex recognises that the occasional acceptance of nominal gifts which are customarily given and/or are of a commemorative nature, may be required in maintaining good business relationships.

However, You are requested to be cautious and take steps to identify any potential or imminent breach of this Policy in such circumstances. Such gifts, hospitality related invitations, events and other promotional expenses having regard to the monetary value and even if the monetary value is not significant if they are offered with the intention of gaining an improper business and commercial advantage then there may be a breach of this Policy.

If in doubt contact Your manager, supervisor or relevant Director of Your organisation. The final decision will lie with the Chief Financial Officer.

Facilitating payments may be a breach of this Policy.

This Policy prohibits the payment or offering of gifts to public officials in order to expedite or facilitate an action or process, such as issue of licenses or permits, which may be commercially advantageous to the Alumex PLC. You may be criminally liable under Sri Lankan Bribery and Anti-corruption laws as well as similar laws of other countries in which the Alumex PLC operates.

This excludes legitimate payments made to fast-track a process; for example legitimate fast-track processes for visa or customs clearance which is authorised by law.

This Policy prohibits payment or offering gifts to any person where the intention is to gain an illegal commercial advantage to You personally or to the Alumex PLC.

Governance Policies

Political contributions and donations to politically connected persons are a breach of this Policy.

This Policy prohibits political contributions or donation to political parties and election candidates as such contributions and donations are viewed as bribes made with the intention of influencing business and official decisions relating to Your organisation with the intention of obtaining commercial gain or similar advantage.

The Alumex PLC companies represent that they strictly do not participate in party politics as has been the ethos of the Company since inception.

This Policy expressly prohibits making any political contributions or donations or incurring political expenditure on behalf of political persons or politically connected persons. The Term 'politically connected persons' will mean the term as is currently used in current legislation or any legislation that defines such term in the future in the country where such offence took place or where such jurisdiction applies.

Charitable Donations may be a violation of this Policy.

You are permitted to make a charitable donation on behalf of the Company where such donation can be made legally and ethically under the laws of that country where the donation is made with all budgetary considerations followed. However, where a charitable donation is made with the intention of gaining an improper business advantage then it is a breach of this Policy. All donations and CSR activities must be carefully assessed for legitimacy and credibility ensuring that it is not being carried out to derive an undue business advantage.

Due diligence of Partners

There may be a risk that Partners may engage in bribery or corruption related activities.

The relevant Business Development Head will determine the level of due diligence required of our Partners. Such due diligence must be completed before the contract with the Business Partner is signed. The Chief Financial Officer together with the Group Head of Legal of Hayleys PLC will decide on any anti-bribery clauses that will be required in relation to entering into any agreement or contract with Partners.

Payment of commissions to third parties

All fees, expenses, and commissions paid to any third party engaged to represent or provide a service to the Company must be appropriate, justifiable and proportionate under the circumstances and will only be for legitimate services rendered.

Your responsibilities under the Policy

- Read, understand and comply with this Policy
- Avoid any activity that might lead to or suggest a breach of this Policy
- Notify Your Manager or a Director as soon as possible if You believe or suspect that a breach or conflict with this Policy has occurred or may occur.

What is not acceptable?

It is not acceptable for You or someone on behalf of You to:

- Give, promise to give, or offer a payment gift or hospitality with the expectation or hope that a business advantage will be received or to reward a business advantage already given or
- Give, promise to give or offer a payment gift or hospitality to a government official agent or representative to facilitate or expedite a routine procure or

- Accept payment from a third party that You know or suspect that is offered with expectation that it will obtain a business advantage for them or
- Threaten or retaliate against another employee or individual who has refused to commit a bribery offence or who has raised concerns under this Policy

7. Record keeping

Many serious bribery and corruption offences often involve some degree of inaccurate record keeping.

Alumex PLC Directors recognise that the Company's records, and financial reporting must be transparent and accurately reflect each of the underlying transactions.

The Chief Financial Officer are responsible for the integrity of the Company's books, records and accounts.

The Alumex PLC companies must maintain accurate and proper books of record and financial reporting. In accordance with the Companies' accounting manual and defined procedures, all expenditure and expense claims must be supported by documentation that accurately and properly describe such expenditure. The reason for the expenditure must be specifically recorded.

No accounts must be kept off book to facilitate or conceal payments.

The Alumex PLC must maintain a register of gifts with specific guidelines drawn up on the quantum of the value of the gifts that should be maintained where You are responsible to declare such gifts. Such register of gifts will be subject to Board review.

8. Communication and training

This Policy is readily accessible for employees and external parties through the Hayleys Group Intranet and Alumex website.

Adequate communication of this Policy and dissemination of this Policy is the responsibility of the Chief Financial Officer.

The Chief Financial Officer is responsible for this Policy and its procedures are embedded through its business and understood by all employees and Business Partners.

Any questions concerning any aspect of this Policy should be referred first to the management who may if relevant refer the matter to the Chief Financial Officer.

The Chief Financial Officer is responsible for identifying employees who may face a risk of exposure to bribery. All employees must complete training programmes on anti-corruption and bribery implemented by the Alumex PLC. Such training has to be recorded and such training is required to be regularly refreshed to take account of changes in the risks faced by the Alumex PLC and any changes in relevant legislation.

Whistle blowing

The Alumex PLC will not allow retaliation against anyone refusing to take part in bribery and corruption.

The Alumex PLC will not commence disciplinary action against any employee who reports bribery related actions of another where such reporting is done in good faith even if they turn out to be mistaken.

Refer to the Alumex PLC Whistleblowing policy.

Effective date of implementation

This policy shall be effective and operative from 1st of October 2024.

2. Policy on Internal Code of Business Conduct and Ethics

1. Purpose

The Alumex Way is an ethical road map for all Alumex employees and provides the guidelines by which the Alumex PLC conducts its businesses and operations.

As a subsidiary of Hayleys PLC, Alumex PLC has adopted the same code of business principles known as "Hayleys Way"

2. Scope

Alumex is committed to conducting its business operations with honesty, integrity and with respect to the human rights and interests of all stakeholders.

All Alumex employees are required to comply with the laws and regulations of the countries in which they operate.

Every employee shall be responsible for the implementation of and compliance with the Code in his / her environment. Failure to adhere to the Code could attract severe consequences, including termination of employment.

3. Policy Statement

a) Competition

Alumex believes in and supports the development of appropriate competition laws and will market the company's products and services in accordance with the principles of fair competition and all applicable regulations and laws and will not make any unfair and/or misleading statements about competitors' products and services.

b) Employees

Alumex is committed to providing equal opportunities to all its employees without regard to their race, caste, religion, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. We will comply with all local labour laws, while encouraging the adopting of international practices.

All employees will be treated with respect and dignity and the right to freedom of association. We will strive to provide all employees with a safe and healthy work environment, and we will not use any form of child labour or forced or compulsory labour.

c) Business Integrity

Alumex PLC and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended, or perceived, to obtain uncompetitive favours for the conduct of its business. The company shall cooperate with governmental authorities in efforts to eliminate all forms of bribery, fraud and corruption.

However, Alumex PLC and its employees may, with full disclosure, accept and offer nominal gifts, provided such gifts are customarily given and / or are of a commemorative nature.

d) Environment

Alumex shall strive to make continuous improvements in the management of environmental impacts and prevent the wasteful use of natural resources and be committed to improving the environment, particularly with regard to the emission of greenhouse gases, and shall endeavour to offset the effect of climate change in all spheres of its activities

Governance Policies

e) Consumers

Alumex is committed to providing world class quality products and services which consistently offer value in terms of price and quality and which are safe for their intended use. The quality standards of the company's goods and services shall meet applicable national and international standards. All products and services will be properly labelled and advertised and communicated.

f) Corporate Responsibility

Alumex is committed to good corporate citizenship, not only in the compliance of all relevant laws and regulations but also by fulfilling our responsibility to improve the quality of life of the people in the communities in which we operate with no harm to human rights and act in the best interest of all stakeholders.

g) Public Activities

Alumex will co-operate with governments and other organisations, both directly and through bodies such as trade associations in the development of proposed legislation and other regulations which may affect legitimate business interests.

Alumex does not support or favour any political party nor contribute to the funds to any party to promote party interests.

h) Shareholders

Alumex PLC shall be committed to enhancing shareholder value and complying with all regulations and laws that govern shareholder rights.

The Board of Directors will provide timely, regular and reliable information on our activities, structure, financial situation and performance to shareholders in accordance with relevant regulations and agreements.

i) Conflict of interest

All Alumex employees shall always act in the interest of the company, and ensure that any business or personal association which he / she may have does not involve a conflict of interest with the operations of the company and his / her role therein.

Alumex employees must not seek gain for themselves or others through misuse or their positions.

j) Regulatory compliance

Employees of Alumex, in their business conduct, shall comply with all applicable laws and regulations in all the territories in which they operate. If the ethical and professional standards of applicable laws and regulations are below that of the Code, then the standards of the Code shall prevail.

Directors of Alumex PLC shall comply with applicable laws and regulations of all the relevant regulatory and other authorities. As good governance practice they shall safeguard the confidentiality of all information received by them by virtue of their position.

4. Policy Administration Procedure

Any breaches to the Code must be reported in accordance with the procedures specified by the HR & Administration Department. The Board of Alumex expects Alumex employees to bring to their attention or to that of Senior Management, any breach of suspected breach of these principles. Provision has been made for employees to be able to report in the strictest of confidence and no employee will suffer as a consequence of doing so.

Effective date of implementation

This policy shall be effective and operative from 18th March 2019.

3. Policy on Risk Management and Internal Controls

1. Objectives

The Alumex PLC operates in a dynamic and rapidly evolving landscape, underscoring the critical importance of proactive risk management practices in building a resilient business model.

Key objectives of the Risk Management Policy are set out below:

- Optimise risk-return dynamics and ensure sustainable business growth through effective management of all risks
- Establish consistent and systematic procedures to effectively identify, measure, manage and mitigate risk exposures
- Enhance the effectiveness and efficiency of the entity's operations, which in turn leads to improvements in resource allocation and decision-making
- Promote prudent risk-based decisions through nurturing a risk conscious culture
- Fulfill all relevant reporting requirements including financial and non-financial internal and external reporting
- Ensure compliance to all laws and regulations the Company is subject to

2. Scope

This Policy applies to all locations and entities within the Alumex PLC including all support functions

3. Risk Classifications

The Company is exposed to a wide array of risks under both the internal and external dimensions. These risks are classified as follows:

- **Market risk:** Potential for financial losses or adverse outcomes resulting from fluctuations in market variables, such as prices, interest rates, exchange rates, and other market conditions
- **Strategic risks:** Risks that arise from the misalignment of the organisation's strategy with business opportunities and developments in the external environment
- **Operational risks:** Risks arising from activities carried out by the organisation, stemming from structure, systems, products or processes
- **Financial risks:** Risks arising from financial operations and include credit risk, interest rate risk, liquidity risk and currency risk among others
- **Information technology risks:** Risk of technological obsolescence and ISS risks which arise from aspects such as external and internal vulnerabilities to the information systems, lack of disaster recovery and back-up procedures
- **Sustainability-related risks:** Environmental and social risks that arise from an entity's lack of recognition of environmental and social sustainability factors affecting society and the entity
- **Governance risks:** Risks arising from the failure to manage other risks due to a lack of robust governance systems.

4. Approach to Risk Management

Alumex approach to risk management is based on the COSO Enterprise Risk Management model, which enables integration with strategy and planning through embedding risk management across all departments and functions. This approach enables to position the risk at total company level allowing it to anticipate risks in a more proactive manner. The

components of the Risk Management Framework are described below:

4.1 Governance and Culture

The Board holds apex responsibility for the management of risk and is assisted by the Audit Committee in discharge of this duty.

4.1.1 Roles & Responsibilities

Responsibility of the Board

- Approval and review of the Risk Management Policy
- Define the organisation's risk appetite and tolerance levels
- Delegate monitoring and reviewing of risk management to the Audit Committee or any other functions as it may deem fit
- Oversee the development of the risk management framework and ensure adequate monitoring and reporting
- Conduct a robust assessment of principal risks facing the organisation (as defined in Section 3 of this Policy), including those that would threaten its business model, future performance, solvency or liquidity
- Set the tone at the top for nurturing a risk management culture, ensuring that it aligns with the organisation's strategy and objectives
- Ensure effective systems are in place to secure the integrity of information, internal controls, cyber security and business continuity

Responsibility of the Audit Committee

- Obtain and review assurance from the Managing Director and management team on the adequacy and effectiveness of the organisation's risk management and internal control systems

- Oversee the processes to ensure that the organisation's internal controls and risk management are adequate to meet the requirements of the Sri Lanka Accounting Standards
- Review and assess the organisation's risk management process, including the adequacy of the overall control environment and controls in areas of significant risks
- Conduct a review of internal controls covering financial, operational and compliance controls and risk management
- Take corrective action to mitigate the effects of specific risks in the case such risks are at levels beyond the risk appetite and tolerance levels determined by the Board

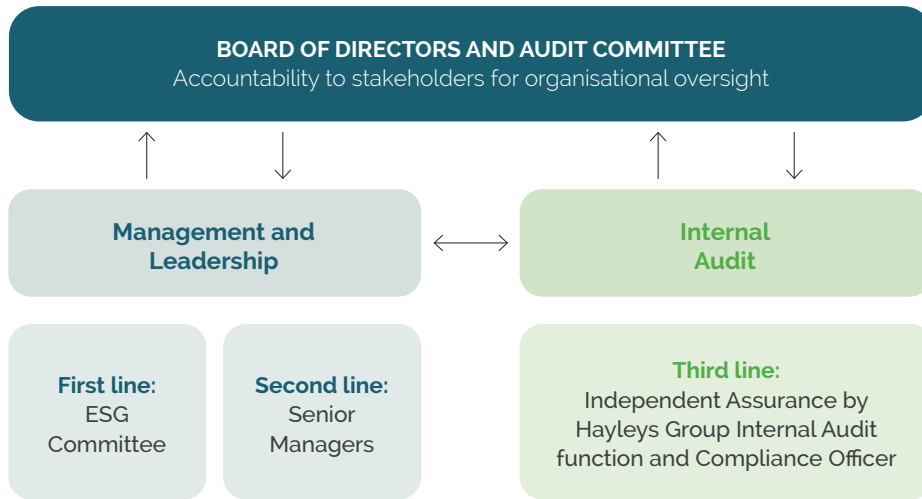
Responsibility of the ESG Committee

- Identify ESG related risks, opportunities and impacts and recommend the implementation of appropriate measures to effectively address these dynamics
- Review emerging trends and issues in the ESG areas and assess potential impact on the Company
- Receive updates at least quarterly or as and when required, on ESG matters including progress against targets, key KPIs and strategy implementation.

4.1.2 Risk management structures

Roles and responsibility allocation for risk management is based on the Three Lines of Defence model which ensures transparency and accountability across the organisation.

Governance Policies



potential risk exposures (including sustainability-related risks) that could impact the organisation has been formulated.

4.3.2 Risk Assessment and Prioritisation

Risks are assessed in terms of severity and likelihood; the former ranges from 1 to 3 (low, medium and high impact) and factors to be considered include financial impact, customer/reputational impact, employee, social and environmental implications among others. Likelihood of risks are assessed from 1 to 3 (low, medium and high impact). Risks assessment and prioritisation is done through a standardised Risk Register. Risks are assessed on the three time periods of short, medium and long-term.

4.3.3 Risk Response

Risk response is defined as the action taken to address identified risks in order to mitigate their impact or likelihood.

4.1.3 Risk Culture

The Alumex Way serves as the Code of Conduct and functions as the ethical roadmap in nurturing a culture of compliance and risk awareness. It is reinforced through regular training, including a session for new recruits at the induction programme.

4.2 Strategy and Objective

Risk appetite is defined as the type and amount of risk the organisation is willing to accept in the pursuit of its strategic aspirations. These targets/ KPIs are reviewed at monthly review meetings. Performance against defined risk KPIs are monitored at quarterly Audit Committee meetings while the relationship between key sector-specific risks and the achievement of business objectives are also assessed. Targets and KPIs are reviewed and revised on an annual basis.

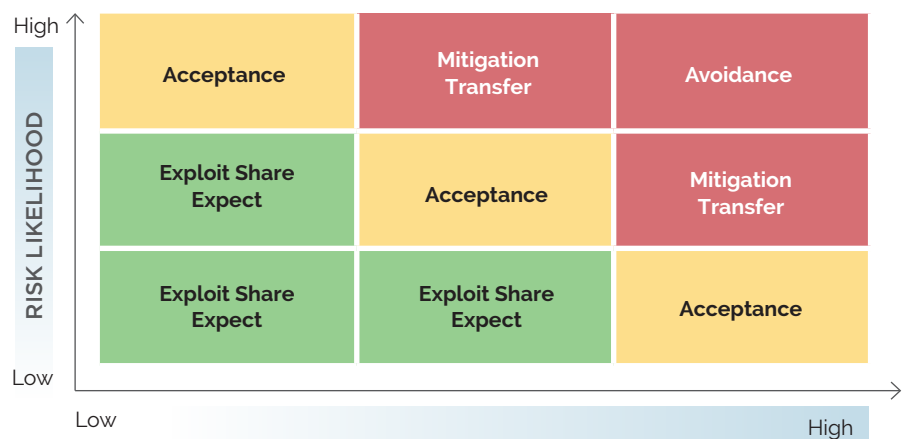
4.3 Performance

4.3.1 Risk Identification

Risks are identified at Business Unit level, with the inputs of key employees across all

functional areas. Risk identification occurs through leadership meetings, assessment of the external operating landscape, materiality analysis, strategic performance updates and engagement with both internal and external stakeholders among others. A risk inventory, cataloguing

Risk Severity



Risk Level : ■ Low ■ Medium ■ High

4.4 Review and Revision

Substantial changes in the Company's risk landscape are continuously assessed through periodic re-evaluation. Potential drivers of change include organisational strategies and objectives, changes to processes, people and technology, emerging stakeholder requirements, changes in regulations and societal expectations among others. The review of risks is an organisation-wide discipline, with dedicated departments discharged with the responsibility for the review of specific risks as listed below:

Area of focus	Division
Financial performance and resilience	Alumex Finance Department
Formulation and negotiation of the insurance programme	Hayleys Group Risk and Insurance
Review of Industry five forces and PESTEL risk from a portfolio perspective	Alumex Finance Department and Senior Management Team
Liquidity and foreign exchange risks	
Funding risks	Alumex Finance Department
Commodity prices and Supply chain risks	Alumex Procurement Department
Safeguarding the digital infrastructure and information assets	Alumex IT Department Hayleys Group IT
Environmental, social and governance risks	Alumex ESG Committee

The monitoring of performance against defined risk metrics and assessing the adequacy of the organisation's internal control frameworks is carried out by the Alumex compliance officer and the Hayleys Group Internal Audit Function, which conducts comprehensive audits based on the annual audit plan. Risk performance is assessed in the context of industry dynamics and peers. A direct line of communication between the Head of Internal Audit and the Chairman of the Audit Committee ensures that concerns are escalated to the Board of Directors as required.

4.5 Communication and Reporting

Risk Registers are updated quarterly and submitted to the Audit Committees for review. Meanwhile, ESG risks are tabled by ESG Team to the ESG Committees prior to being submitted to the Audit Committee. Meanwhile, key findings from the audits conducted by the Internal Audit Division are escalated to the Alumex PLC Audit Committee for corrective action.

5.0 Review and update

This policy shall be reviewed and updated at least once every two (2) years by the Chief Financial Officer. The required updates and modifications shall be recommended to the Chairman and to the Board for approval. All stakeholders shall be informed of any revisions made to this Policy. Alumex PLC reserves the right to modify/amend the policy at any time.

Effective date of implementation

This policy shall be effective and operative from 1st of October 2024.

Annexure 1: Risk Inventory

Risk category	Risk exposure
Market risk	Geopolitical risk
	Domestic political risk
	Economic risk
	Interest rate risk
	Foreign currency risk
Strategic risk	Competition
	Subdued demand
	Failure of new products/services
Financial/Credit risk	Liquidity and financial stability
	Counterparty risk
	Credit risk
Operational risk	Reputational risk
	Increasing raw material prices and discontinuation of key supply chains
	Increase in energy cost
	Legal risk
	Compliance risk
IT risk	Data protection and IT governance
	Information system availability risk
	Cyber security
Environmental risk	Climate risks
	Raw material related risks
	Water
	Energy
	Waste
	Biodiversity
	Product environmental impacts
Social risk	Employee relations
	Customer/market demand
	Product social impacts
	Supply chain relationships
	Human rights
	Community relations
	Reputational risk
Governance	ESG related regulations
	Anti-corruption and bribery
	Fraud
	Social and environmental compliance
	Stakeholder engagement
	Transparency and reporting

Annexure 2: Risk Register

Risk exposure	Description of risk/ opportunity	Potential impacts (Financial/Impact on capital and funding/Reputation/ Environmental/ Social)	Risk -ranking									Risk metrics
			Short term			Medium term			Long term			
			Impact	Probability	Ranking	Impact	Probability	Ranking	Impact	Probability	Ranking	
Risk 1												
Risk 2												

Notes

