



# **Modern Slavery Statement**

## 1. INTRODUCTION

This statement sets out actions to understand all potential modern slavery risks related to LSKB Aluminium Foils Private Limited (hereinafter referred to as “The Company”) and its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2024.

As part of Aluminium Industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## 2. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

This statement covers the activities of LSKB:

- Aluminium Rolling Operations
- Raw Material Suppliers

The organisation currently operates in the following countries:

- India

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Conflict-affected and high-risk areas (CAHRAs) (<https://www.cahraslist.net/>)

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Management
- **Risk assessments:** Human Rights Committee
- **Investigations/due diligence:** Human Rights Committee
- **Training:** Regular Trainings provided to Employees as well as an awareness initiative for Suppliers too.

## 3. RELEVANT POLICIES

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make

disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form or write to Ethics & Whistle-blower committee.

- **Employee Code of Conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier Code of Conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Human Rights Policy:** Organisations has human rights policy with a complementing complaint mechanism like committee and redressal mechanism.

#### **4. DUE DILIGENCE**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include Risk Assessment of suppliers:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through various engagement models like trainings and awareness sessions, policy making help and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## **5. PERFORMANCE INDICATORS**

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Guidelines (Global). As a result, the organisation is:

- requiring all staff to have completed training on modern slavery;
- reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

## **6. TRAINING**

The organisation requires all staff/staff within the organisation to complete training on modern slavery.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

## **7. AWARENESS-RAISING PROGRAMME**

As well as training staff, the organisation has raised awareness of modern slavery issues by.

The emails explain to staff:

- the basic principles of the Modern Slavery;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.