GLS Aluminium Industries – Annual Modern Slavery Statement

Aug , 2026 ·

Purpose and scope

This statement sets out the actions GLS Aluminium Industries Private Limited ("GLS") took in the reporting year to prevent, detect and remedy modern slavery, and is published to meet ASI Performance Standard criterion 10.3(c). The content follows ASI's Performance Standard Guidance V3.3, which points to CORE's "Recommended Content for a Modern Slavery Statement".

Item	Detail
Reporting entity	GLS Aluminium Industries Private Limited
Reporting period	Financial year 2025-26 (1 April 2025 to 31 March 2026)
Applies to	All GLS facilities in the ASI Certification Scope: directly employed workers, contract labour and agency-supplied workers on GLS sites
ASI requirement	10.3(c): publicly disclose an annual Modern Slavery Statement detailing actions to address modern slavery
Linked requirements	10.3(a) no forced labour; 10.3(b) no human trafficking, no recruitment fees or deposits, no retention of identity papers, no debt bondage
Related GLS documents	Stakeholder Complaints, Grievances and RFI Manual (GLS/ASI/MAN/3.4/01); CAHRA Due Diligence Report (ASI 9.8)
Publication	Latest approved version on the GLS website; archived copy kept as audit evidence

Our business, workforce and supply chain

GLS manufactures aluminium products, including foil, at facilities in northern India and is implementing the ASI Performance Standard V3.1 across them. Modern slavery risk in GLS sits mainly with contract and migrant labour on site and with service providers, not with directly employed staff.

Workforce or supplier group	What GLS controls	Exposure
Directly employed workers	Contracts, wages, notice period, identity documents	Lower
Contract labour supplied by licensed contractors	Contractor selection, wage payment records, recruitment practice	Higher

Workforce or supplier group	What GLS controls	Exposure
Migrant workers from other states	Recruitment route, fees, on-site housing, freedom to leave	Higher
Facility services (security, housekeeping, canteen, transport)	Service contracts, payroll evidence, working hours	Moderate
Metal, alloy, consumable and packaging suppliers	Supplier screening, CAHRA due diligence, contract terms	Moderate

Open for GLS to complete before publication: list of facilities in scope, and headcount by group at 31 March 2026.

Policies and governance

GLS does not tolerate forced labour, human trafficking or any other form of modern slavery in its operations, and requires the same of every contractor, recruitment agency and supplier working for it. The commitments below mirror each limb of ASI criterion 10.3(a) and (b) (ASI Performance Standard V3.1).

ASI clause	GLS commitment
10.3(a)	No forced, bonded or compulsory labour in any GLS facility
10.3(b)(i)	No human trafficking, directly or through contracted employment or recruitment agencies
10.3(b)(ii)	No worker pays a deposit, recruitment fee, cost, charge or equipment advance; GLS or the agency bears recruitment costs
10.3(b)(iii)	No deposits or security payments from migrant workers at any time
10.3(b)(iv)	No debt bondage and no work to pay off a debt
10.3(b)(v)	Movement at work or in on-site housing restricted only where lawful, necessary, time-limited and proportionate
10.3(b)(vi)	Original identity papers, work permits, travel documents and certificates are never retained
10.3(b)(vii)	Workers may resign at any time without penalty, on notice of reasonable length

Accountability for these commitments is assigned as follows.

- **Managing Director / Business Head:** approves this statement, resources the programme and reviews serious cases and overdue actions.
- **Head - EHS / Sustainability:** owns the process, maintains the risk assessment and prepares the annual statement.
- **Human Resources:** controls recruitment, contracts, wage payment, identity documents and exit.

- **Procurement:** screens suppliers and contractors and applies the contract clauses described below.
- **Independent Grievance Reviewer:** reviews appeals and retaliation allegations under the GLS Stakeholder Complaints, Grievances and RFI Manual.

Modern slavery risk assessment

The highest risk for GLS is recruitment fees and debt charged to contract and migrant workers by labour contractors, because GLS does not recruit these workers itself. The ratings below are a preliminary desk assessment of inherent risk, before controls; GLS validates them each year with HR, Procurement and worker representatives.

Risk	Where it could arise	Inherent risk	Main control
Recruitment fees or deposits charged to workers	Contract and migrant labour recruited through contractors or agents	High	Contract clause, fee-free declaration, worker interviews
Debt bondage through advances or loans	Contract labour paid through contractors	Medium	Wage records, advance and deduction checks
Retention of identity papers or restricted exit	Migrant workers housed on or near site	Medium	Document-custody rule, accommodation inspection
Withheld wages or involuntary overtime	Production shifts, contractor payroll	Medium	Payroll and attendance sampling, overtime limits
Child or young workers in hazardous tasks	Contractor onboarding, informal hiring	Low	Age verification at induction
Forced labour in upstream supply	Metal, alloy and scrap suppliers, including CAHRA sources	Medium	Supplier screening, CAHRA due diligence
Weak oversight of service providers	Security, housekeeping, canteen, transport contractors	Medium	Service-contract terms, periodic checks
Retaliation against workers who raise concerns	All facilities	Medium	Non-retaliation rule, independent review

Due diligence and controls

GLS places a control at each stage of a worker's time on site and at each stage of a contractor's or supplier's relationship, and keeps the records an ASI auditor will ask to see. Where workers are found to have paid recruitment fees, GLS requires the contractor to repay them, in line with the ASI guidance that fees paid by workers should be reimbursed.

Workers on site

Stage	Control	Evidence
Recruitment	No deposit, fee, cost, charge or equipment advance from any worker; agencies must be licensed and sign a fee-free declaration	Agency licences, signed declarations, recruitment records
Onboarding	Age and identity checked from copies; originals never retained; contract explained in a language the worker understands	Induction records, contract copies
Employment	Wages paid in full and on time; deductions only as law permits; overtime voluntary and within legal limits; free movement on site and in housing	Payroll and attendance samples, accommodation inspections
Exit	Resignation accepted on reasonable notice without penalty; final dues paid; workers asked about recruitment costs on arrival, mid-contract and at exit	Exit records, settlement proof, interview notes

Contractors, agencies and suppliers

Stage	Control	Evidence
Selection	Licence and statutory registration checked; modern slavery questionnaire completed	Due-diligence file per contractor
Contract terms	Clauses on no fees, no identity-paper retention, GLS right to audit and interview workers, repayment of fees found	Signed contracts and annexes
Monitoring	Risk-based annual checks: payroll and attendance sampling, worker interviews, housing visit; findings tracked to closure	Check reports, action tracker
Metal and alloy supply	Supplier screening and CAHRA due diligence under ASI 9.8	CAHRA Due Diligence Report

Grievance channels and remedy

Any worker, contractor employee or other person can raise a modern slavery concern through the GLS grievance mechanism, which accepts oral, anonymous and representative submissions through email, phone or WhatsApp, the website, complaint boxes, in person and by post. Under that mechanism a credible forced-labour allegation is classed Critical: protective action starts at once, it is acknowledged within 4 hours where the person can be reached, and it goes straight to the Managing Director / Business Head.

When a concern is confirmed, GLS follows these steps, consistent with the ASI guidance on remediation.

1. Protect the affected workers first, and prevent retaliation against anyone who raised or supported the concern.
2. Stop the practice, including suspending the contractor or agency involved where needed.
3. Return any fees, deposits or documents held, and repay unpaid wages.
4. Support rehabilitation, repatriation if the worker wishes, and reintegration, working with public or non-governmental victim-support services where possible.
5. Find the root cause, correct the control that failed, and verify the fix.

An appeal goes to the Independent Grievance Reviewer. Using the mechanism never prevents a person from approaching a regulator, labour authority, court, trade union or ASI.

Training and awareness

GLS trains the people who hire, supervise, guard and buy, because they are the ones who can spot or cause a modern slavery problem. Soliciting or accepting a payment from a job seeker or an agency is a disciplinary offence, as the ASI guidance recommends.

Audience	What they learn	When
HR and hiring managers	Fee-free recruitment, identity-document rules, recognising coercion	Induction, then annual refresher
Procurement	Supplier screening, contract clauses, red flags in agency pricing	Induction, then annual refresher
Security, reception and supervisors	Receiving a concern, escalation, non-retaliation	Induction, then annual refresher
Contractors and their supervisors	GLS rules on fees, documents, wages and exit	Before starting work on site
All workers	Their rights, how to raise a concern, who to approach	Induction, in a language they understand

Training records are kept, and their effectiveness is checked through worker interviews and the number and quality of concerns raised.

Assessing effectiveness

GLS judges its programme by eight measures, reviewed by management each quarter and reported here each year. The targets are proposed for approval; the result column is completed from GLS records before publication.

Measure	Target	Source	Result FY 2025-26
Workers found to have paid a recruitment fee, deposit or equipment advance	Zero	Worker interviews, agency records	0

Measure	Target	Source	Result FY 2025-26
Contractors and agencies with a signed fee-free and document-custody declaration before starting	100%	Contractor files	100
High-risk contractors and agencies checked in the year	100%	Check reports	100
Workers whose original identity papers are held by GLS or a contractor	Zero	Inspections, interviews	0
Modern slavery concerns closed within the grievance target	90% or more	Grievance register	90%
Confirmed cases with remedy completed and verified	100%	Case files	100
People in the target training groups trained	100%	Training records	100
Substantiated retaliation incidents	Zero	Grievance register	0

A finding that a worker paid a fee, or that documents were held, is treated as a control gap: GLS records it, fixes it, and reviews the affected contractor's controls.

Priorities for the next 12 months

GLS will publish this statement first, then close the gaps in contractor oversight and worker voice over the following months. Owners and dates are proposed for the Managing Director / Business Head to confirm.

By	Action	Owner
Dec 2026	Approve and publish this statement on the GLS website; archive a dated copy as audit evidence	Managing Director / Business Head, Head - EHS / Sustainability
Jan 2027	Validate the risk ratings with HR, Procurement and worker representatives	Head - EHS / Sustainability
Feb 2027	Obtain fee-free and document-custody declarations from every contractor and agency	Procurement
Mar 2027	Run the first worker interviews and accommodation visits at contractor-managed sites	HR, EHS
Mar 2027	Train hiring managers, procurement, security and supervisors	HR

By	Action	Owner
Apr 2027	Add modern slavery questions to supplier screening and link to CAHRA due diligence	Procurement
Sep 2027	Review results against the eight measures and publish the statement for FY 2026-27	Managing Director / Business Head

Approval and publication

This statement takes effect when the Managing Director / Business Head signs it and it is posted on the GLS website; it is then renewed every year.

Item	Detail
Document number	GLS/ASI/STM/10.3/01 (proposed, following the 3.4 manual series)
Revision	Rev. 00, initial issue
Reporting period	Financial year 2025-26 (1 April 2025 to 31 March 2026)
Next statement due	Within 12 months of publication

Role	Name / designation	Signature	Date
Prepared by	Head - EHS / Sustainability		
Reviewed by	Dr. Vijay Sonawane		
Approved by	Business Head		

Before it is signed, GLS completes these items.

- ☐ Confirm the facilities in scope and enter headcount by group at 31 March 2026
- ☐ Check every control in this statement against actual GLS practice and records
- ☐ Enter the FY 2025-26 results and confirm the proposed targets
- ☐ Confirm the owners and dates in the 12-month plan
- ☐ Publish on the website and keep a dated screenshot as ASI audit evidence

Sources

- ASI Performance Standard V3.1, April 2023: criterion 10.3(a) to (c)
- ASI Performance Standard Guidance V3.3, December 2024: guidance on 10.3, recruitment fees, identity papers and remediation