ASI PERFORMANCE STANDARD V3.1

STAKEHOLDER COMPLAINTS, GRIEVANCES AND REQUESTS FOR INFORMATION MANUAL

Criterion 3.4(a-f) | Operational-level Complaints Resolution Mechanism

Organisation	GLS Aluminium Industries Private Limited
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Process owner	Head - EHS / Sustainability
Independent person	Dr. Vijay Sonawane - Independent Grievance Reviewer

CONTROLLED MASTER

The current public version shall be available through the GLS website and communicated to affected stakeholders.

Document Control

Role	Name / designation	Signature	Date
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Independently reviewed by	Dr. Vijay Sonawane - Independent Grievance Reviewer	Kamal B	06 September 2026
Approved by	Managing Director / Business Head	Rajesh Singh	06 September 2026

Revision History

Revision	Effective date	Description of change	Approval
00	06 September 2026	Initial issue aligned with ASI Performance Standard V3.1, Criterion 3.4(a-f).	Managing Director / Business Head

Controlled Distribution

Copy / location	Access	Control requirement
Company website	Public	Latest approved public version and current complaint channels.
Main gate / reception / security	Public	Summary notice in English and Hindi/local language.
EHS / Sustainability and HR	Internal	Controlled master, case files and performance records.
Independent Reviewer	Restricted	Access required for appeal, oversight and effectiveness review.
Contractors and key service providers	Shared	Current process and reporting channels included in induction.

DOCUMENT STATUS

Printed copies are uncontrolled unless specifically stamped and issued. Case records containing personal information are confidential and are not part of the public disclosure copy.

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1. Purpose

This Manual establishes the GLS operational-level mechanism for receiving, acknowledging, assessing, investigating, resolving, recording, reviewing and reporting stakeholder complaints, grievances and requests for information connected with GLS activities, products, services, contractors and Area of Influence.

The mechanism is intended to identify concerns early, prevent escalation, provide fair and rights-compatible remedy, strengthen stakeholder relationships and convert case experience into continual improvement.

2. Scope

This Manual applies to all GLS facilities, functions, Workers, contractors and agents within the ASI Certification Scope, and to impacts arising from activities within GLS control or influence.

The mechanism is open to Affected Populations and Organisations and other stakeholders, including:

- Nearby residents, land users, community representatives and local institutions.
- Workers, contract workers, former workers and their representatives where the issue relates to operational impacts or access barriers.
- Customers, suppliers, transporters, contractors and other business partners.
- Government bodies, emergency services, civil-society organisations and subject-matter institutions.
- Any person or organisation seeking information or raising a good-faith concern regarding GLS operations.

The mechanism covers concerns relating to environment, health and safety, community impacts, Human Rights, labour practices, security conduct, transport, noise, air emissions, water, Waste, biodiversity, land access, ethics, responsible sourcing and governance.

3. References

- ASI Performance Standard V3.1 (April 2023), Criterion 3.4 - Stakeholder Complaints, Grievances and Requests for Information.
- ASI Performance Standard Guidance, latest effective version, Criterion 3.4 and guidance on Public Disclosure and Regular Review.
- United Nations Guiding Principles on Business and Human Rights, Principle 31 - effectiveness criteria for non-judicial grievance mechanisms.

- GRI 2: General Disclosures 2021, Disclosures 2-25 and 2-26; and GRI 3: Material Topics 2021, Disclosure 3-3.
- Applicable Laws, permits, contractual obligations and GLS environmental, social, governance and Human Rights policies.

4. Definitions

Term	Meaning
Affected Populations and Organisations	People or organisations that may experience actual or potential environmental, social, cultural, economic, Human Rights or governance impacts from GLS activities.
Complaint	An expression of dissatisfaction about GLS activities, conduct, impacts, decisions or service for which a response or corrective action is expected.
Grievance	A concern alleging actual or potential harm, unfair treatment, rights impact or unresolved complaint that may require investigation and remedy.
Request for Information (RFI)	A request for accurate and accessible information about GLS operations, impacts, controls, plans or disclosed performance.
Complainant	A person or organisation submitting a complaint, grievance or RFI directly or through an authorised representative.
Remedy	An action intended to stop, correct, mitigate, restore or compensate for adverse impact and prevent recurrence, as appropriate to the circumstances.
Retaliation	Any threat, intimidation, harassment, discrimination, adverse employment action or other disadvantage caused by raising or participating in a concern in good faith.
Independent Reviewer	A person with sufficient competence, authority and freedom from operational involvement or conflict of interest to review appeals, sensitive cases and effectiveness of the mechanism.
Control gap	Evidence that the mechanism is unavailable, ineffective, delayed, unfair, unsafe, poorly communicated, inconsistently applied or otherwise unable to meet its intended purpose.
Good faith	A sincere report based on information reasonably believed to be true, regardless of whether the concern is ultimately substantiated.

5. Policy Commitments

- GLS will accept complaints, grievances and RFIs without charge and without unnecessary formality.
- No time limit applies to raising a concern; late submissions are assessed on their merits.
- Oral, written, anonymous and representative submissions will be accepted in languages and formats reasonably accessible to the complainant.
- Good-faith complainants and participants will be protected against retaliation.
- Confidentiality will be maintained to the extent possible, consistent with fair investigation and Applicable Law.
- No outcome will require a complainant to waive access to courts, regulators, trade unions, ASI or other legitimate mechanisms.

- Cases will be handled with dignity, impartiality, cultural sensitivity, gender responsiveness and respect for internationally recognised Human Rights.
- The mechanism will prioritise dialogue and mutually acceptable solutions wherever feasible.
- Information from cases will be analysed to improve controls and prevent recurrence.

NON-RETALIATION

Any allegation of retaliation is treated as a high-priority grievance, escalated immediately to the Business Head and independently reviewed. Retaliation may result in disciplinary or contractual action.

6. ASI Effectiveness Principles

Principle	How GLS gives effect to it
Legitimate	Clear authority, impartial decision-making, conflict controls and access to independent review.
Accessible	Multiple free channels; anonymous, oral, local-language and assisted submissions accepted.
Predictable	Published stages, responsibilities, indicative timelines, possible outcomes and appeal route.
Equitable	Reasonable access to information, advice, translation, representation or specialist support.
Transparent	Case progress is communicated and aggregate performance is reported without breaching confidentiality.
Rights-compatible	Processes and remedies respect internationally recognised Human Rights and avoid further harm.
Continuous learning	Trends, root causes and stakeholder feedback drive corrective and preventive improvement.
Engagement and dialogue	The parties are heard and solutions are developed through respectful dialogue.
Adequate scope	The mechanism addresses complaints, grievances and RFIs concerning all relevant GLS operational impacts.

7. Governance, Roles and Independence

7.1 Managing Director / Business Head

- Approve this Manual and ensure sufficient people, budget, authority and specialist support.
- Ensure serious or systemic impacts receive prompt action and remedy.
- Review trends, overdue cases, retaliation allegations and systemic corrective actions.

7.2 Designated Grievance Officer

- Be appointed in writing; name and contact details are shown on the public notice.
- Maintain current public access channels and receive, register and acknowledge every submission.
- Conduct initial safety, rights, legal and materiality triage; appoint a competent Case Owner.
- Protect confidentiality, monitor timelines, communicate progress and maintain case records.

- Escalate critical, sensitive, retaliatory or conflict-of-interest cases to the Independent Reviewer.
- Have direct access to the Managing Director / Business Head and authority to require corrective action.
- Prepare quarterly trends, annual disclosures and mechanism review inputs.

7.3 Independent Grievance Reviewer - Dr. Vijay Sonawane

- Provide independent oversight of the mechanism and advise on fairness, accessibility and rights compatibility.
- Review appeals, disputed closures, retaliation allegations, sensitive Human Rights matters and cases involving senior management.
- Confirm or change case classification; require additional investigation, consultation, specialist advice or remediation.
- Verify that case outcomes are supported by evidence and that complainants have been heard.
- Participate in the annual effectiveness review and the mandatory review required by Criterion 3.4(c-e).
- Report significant control gaps directly to the Managing Director / Business Head.

Independence safeguard: Before accepting a review, Dr. Vijay Sonawane shall declare any actual, potential or perceived conflict. Where independence could reasonably be questioned, GLS shall appoint another competent external reviewer for that case. The Independent Reviewer will not investigate or decide a complaint concerning his own conduct or services.

7.4 Functional Heads and Case Owners

- Preserve evidence; cooperate with investigation; prevent retaliation and implement agreed corrective actions.
- Do not contact, pressure or disadvantage the complainant outside the authorised process.
- Provide accurate updates and effectiveness evidence to the Grievance Officer.

7.5 Security, Reception and Supervisors

- Accept oral or written submissions respectfully and immediately forward them to the Grievance Officer.
- Assist persons who cannot read, write or use digital channels, without changing their statement.
- Never refuse a complaint because it is anonymous, informal, outside working hours or critical of GLS.

8. Access Channels

GLS shall maintain multiple access channels. Current contact details shall be displayed at the main gate, reception, website and relevant stakeholder communication points and tested at least quarterly.

Channel	Control	Primary use
Email	Dedicated grievance email published by GLS	Written and document-supported submissions
Telephone / WhatsApp	Dedicated number published by GLS	Voice, text and local-language access
Website	Complaint/RFI page or downloadable form	Public and remote access
Complaint box	Main gate/reception and suitable internal points	Written or anonymous submission
In person / oral	Security, reception, Grievance Officer or nominated community contact	Assisted submission without literacy barrier
Post	Facility postal address shown on public notice	Formal or representative submission
Independent review	Contact route to Dr. Vijay Sonawane maintained by GLS	Appeal, retaliation, senior-management or conflict cases

ACCESSIBILITY RULE

A complaint must not be rejected because it is oral, anonymous, in a local language, submitted through a representative, lacks legal terminology or is supported by incomplete evidence.

9. Matters Covered and Referral Interfaces

Category	Examples
Environment	Air, odour, noise, vibration, water, discharge, Waste, spills, soil, biodiversity, resource use.
Community and safety	Traffic, road safety, emergency impacts, access, security behaviour, nuisance and community health.
Human Rights and labour	Discrimination, harassment, forced or child labour indicators, freedom of association, wages, working conditions, contractor conduct.
Ethics and governance	Corruption, conflicts of interest, unfair conduct, privacy, responsible sourcing and misleading information.
Requests for information	Permits, disclosed ESG performance, management plans, operational controls and other non-confidential information.

Where a matter is more appropriately managed under a specialised mechanism, such as emergency response, POSH, whistleblowing, occupational grievance, product complaint or legal process, the Grievance Officer shall make a controlled referral, obtain the complainant's informed consent where appropriate, and continue tracking the matter until an accountable process accepts it. Referral does not remove the requirement to prevent retaliation or monitor closure.

10. Complaint Resolution Procedure

This process applies to every complaint, grievance and request for information, whichever channel is used. Figure 1 summarises the flow; Steps 1 to 9 set out the requirements, Section 10.10 the escalation pathway and indicative timeframes, and Section 11 the appeal route.

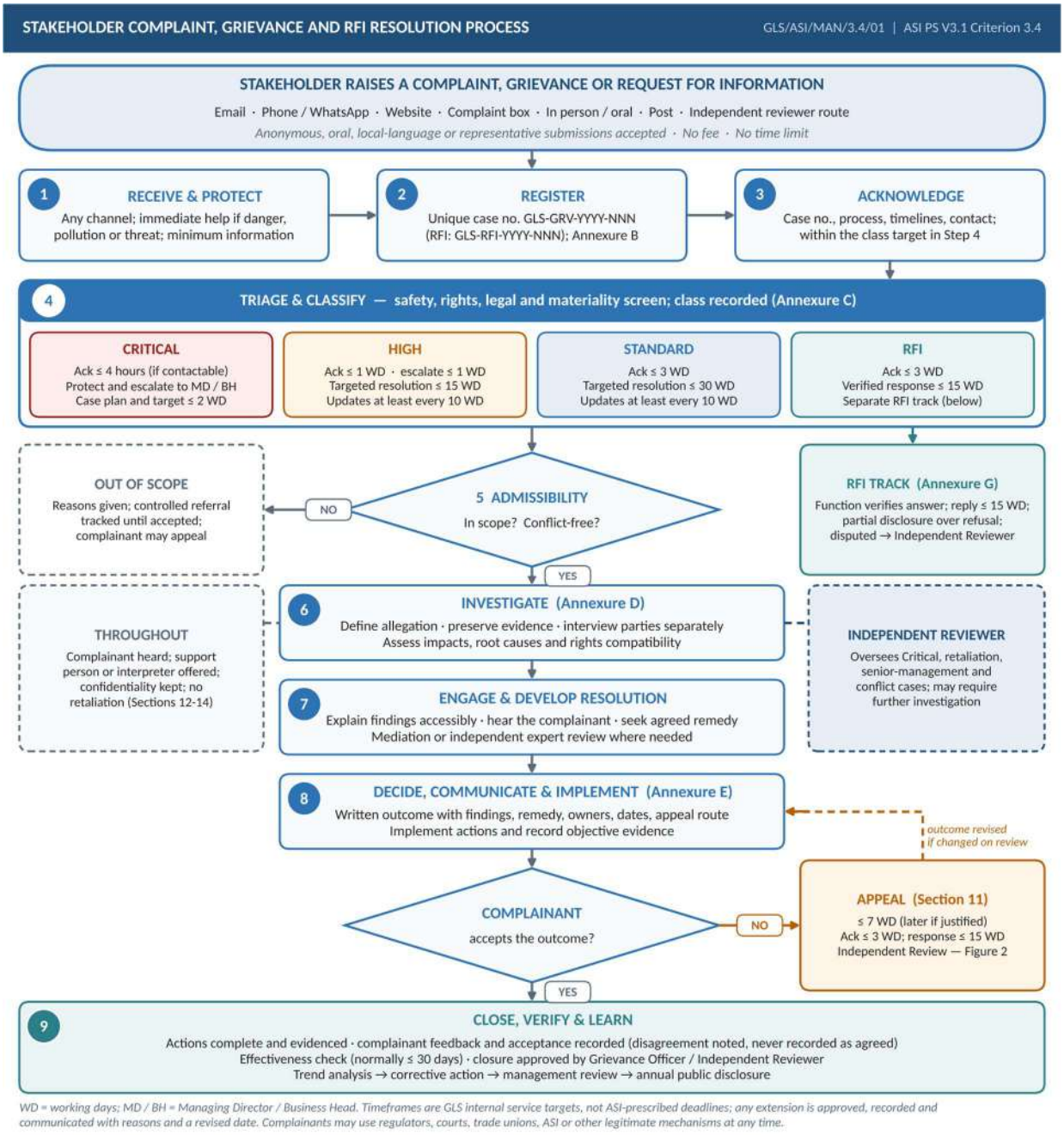


Figure 1 - Stakeholder complaint, grievance and RFI resolution process (summary of Section 10)

10.1 Step 1 - Receive and protect

1. Receive the submission through any approved channel and provide immediate assistance where there is imminent danger, serious pollution, threat, violence or risk of evidence loss.
2. Ask only the minimum information needed to understand the concern. Do not require the complainant to prove the case at intake.
3. Confirm confidentiality and communication preferences and assess whether protective measures are required.
4. Accept the concern whether or not the Annexure A form is used and without any time limit. Record oral submissions faithfully in the complainant's own words and confirm the record with the complainant where possible.

10.2 Step 2 - Register

The Grievance Officer assigns a unique case number in the format GLS-GRV-YYYY-NNN and records the date, channel, stakeholder category, subject, location, confidentiality request, initial risk and responsible Case Owner. Anonymous submissions receive the same case-control requirements. Requests for information are recorded in the same register under a separate number in the format GLS-RFI-YYYY-NNN.

10.3 Step 3 - Acknowledge

GLS acknowledges receipt within the applicable target in Step 4 (Section 10.4), provides the case number, explains the process and timelines, identifies the contact person and confirms how updates will be provided. An acknowledgement does not prejudge the merits of the concern. Where a case is Critical, immediate protective action takes priority over written acknowledgement and is recorded. Acknowledgement uses the method and language preferred by the complainant; anonymous complainants are acknowledged through the case-code channel where one is provided (Section 12).

10.4 Step 4 - Triage and classify

Class	Trigger	Initial response
Critical	Imminent life/safety threat; major uncontrolled environmental release; severe Human Rights allegation; retaliation; credible child/forced labour; violence; senior-management implication.	Immediate protective action; escalate at once to the Managing Director / Business Head; acknowledge within 4 hours where contactable; case plan and resolution target set within 2 working days; weekly progress updates.
High	Potential significant harm, regulatory breach, multiple affected persons, repeated failure or sensitive allegation.	Acknowledge and escalate within 1 working day; targeted resolution within 15 working days; progress updates at least every 10 working days.

Class	Trigger	Initial response
Standard	Localised, reversible or routine concern without immediate serious harm.	Acknowledge within 3 working days; targeted resolution within 30 working days; progress updates at least every 10 working days.
RFI	Request for accurate operational or ESG information without an allegation of harm.	Acknowledge within 3 working days; respond within 15 working days.

These are GLS internal service targets, not ASI-prescribed deadlines. Complex cases may require additional time. Any extension must be reasonable, approved, recorded and communicated with reasons and a revised date.

The Grievance Officer records the classification. It is raised whenever new facts show greater risk and lowered only with recorded reasons; the Independent Reviewer may confirm or change it on request (Section 7.3). Timeframes for every stage are consolidated in Section 10.10.

10.5 Step 5 - Determine admissibility and pathway

- Confirm the issue is connected with GLS activities, impacts, contractors or influence.
- Identify applicable legal, permit, contractual, policy and ASI requirements.
- Check for conflict of interest and determine whether independent oversight is required.
- Agree the investigation and engagement pathway with the complainant where feasible.
- If outside scope, explain the reason and, where possible, provide a suitable referral. The complainant may appeal the scope decision.

10.6 Step 6 - Investigate

- Define the allegation, questions to be answered, evidence required, people to be interviewed and target completion date.
- Preserve documents, electronic records, monitoring data, photographs, samples and physical evidence.
- Interview the complainant and relevant persons separately and respectfully; offer a support person or interpreter where needed.
- Assess actual and potential impacts, root causes, contributing factors, control failures and possible remedies.
- Use competent independent technical or Human Rights expertise where case complexity or credibility requires it.
- Apply balance-of-information reasoning for internal findings; do not impose criminal-law standards of proof.

10.7 Step 7 - Engage and develop resolution

The Case Owner and Grievance Officer shall explain findings in an accessible form, hear the complainant's views and seek an agreed resolution. GLS shall not unilaterally declare a disputed remedy satisfactory merely because an action was completed internally.

Resolution options may include one or more of the following:

- Immediate cessation or containment of harm.
- Correction, repair, restoration, clean-up or reinstatement.
- Apology, explanation or correction of inaccurate information.
- Reimbursement or compensation where lawful, appropriate and approved.
- Changes to equipment, traffic, work methods, supervision, contractor controls or policy.
- Training, disciplinary or contractual action, subject to confidentiality.
- Mediation, independent expert review or referral to a legitimate external process.
- Monitoring commitments and preventive actions addressing systemic root causes.

Where dialogue does not produce an agreed resolution, GLS shall explain the appeal route in Section 11 and offer independent mediation or specialist review. A complaint shall not be decided solely by the person whose conduct or function is the subject of the complaint.

10.8 Step 8 - Decide, communicate and implement

The written outcome shall identify the issues considered, evidence basis, findings, agreed or proposed remedies, responsible persons, target dates, monitoring plan and appeal route. Information may be redacted where necessary to protect privacy, safety, legal privilege or legitimate commercial confidentiality, but the complainant shall receive enough information to understand the decision. The outcome is issued within the resolution target in Step 4 or the approved revised date, and is explained orally or in the complainant's preferred language where needed.

10.9 Step 9 - Close and verify

- Confirm all agreed actions are completed and supported by objective evidence.
- Seek the complainant's written or recorded feedback and acceptance where possible.
- If the complainant disagrees, record the disagreement and explain the appeal route; do not record an agreed closure.
- Conduct an effectiveness check normally within 30 days, or longer where environmental or social recovery requires monitoring.
- Close the case only after approval by the Grievance Officer or Independent Reviewer, as applicable.

10.10 Escalation Pathway and Indicative Timeframes

A case moves up a level when risk increases, a target is missed, the complainant disputes the handling, or a conflict of interest or retaliation allegation arises.

- Level 1 - Case Owner and Grievance Officer: receive, register, acknowledge, triage, investigate and resolve.
- Level 2 - Managing Director / Business Head: Critical and High cases, overdue cases, systemic impacts and resources.
- Level 3 - Independent Reviewer: appeals, disputed closures, retaliation allegations, senior-management involvement and conflicts of interest.
- Level 4 - External independent mediation or specialist review, and external remedy mechanisms, which remain available at any stage.

Table 10-1: Indicative stage timeframes by class

Stage	Critical	High	Standard	RFI
Protect / contain	Immediate	Same day where risk exists	As needed	Not applicable
Acknowledge	4 hours where contactable	1 working day	3 working days	3 working days
Escalate	At once to MD / Business Head	Within 1 working day	If overdue or risk rises	If the response is disputed
Case plan and target confirmed	Within 2 working days, set by MD / Business Head	At triage	At triage	At triage
Progress updates	Weekly	At least every 10 working days	At least every 10 working days	Not applicable
Targeted resolution / response	As set in the approved case plan	15 working days	30 working days	15 working days
Written outcome	Within the resolution target or approved revised date	Within the resolution target or approved revised date	Within the resolution target or approved revised date	With the response

For all classes: an appeal is normally submitted within seven working days of the decision (later where justified), acknowledged within three working days and answered by the Independent Reviewer normally within 15 working days; the effectiveness check is normally completed within 30 days of implementation. These are GLS internal service targets, not ASI-prescribed deadlines.

11. Appeals and Independent Review

A complainant may appeal an admissibility decision, finding, remedy, delay or closure. Appeals should normally be submitted within seven working days of the decision; a late appeal shall still be considered where vulnerability, access barriers, new evidence or risk of harm provides reasonable justification. Appeals are acknowledged within three working days.

Dr. Vijay Sonawane, as Independent Grievance Reviewer, shall:

- Confirm independence and absence of conflict for the specific case.
- Review the full file, contact the complainant and obtain any additional evidence required.
- Uphold, modify or set aside the decision; reopen the investigation; require further consultation; or recommend external mediation or specialist review.
- Issue a reasoned independent review response, normally within 15 working days, or communicate a justified extension.
- Verify completion of resulting actions and report systemic control gaps directly to senior management.

The Independent Reviewer's response completes this operational-level mechanism. Where the matter remains unresolved, GLS shall offer independent mediation or specialist review; this does not limit the complainant's right to use any external remedy.

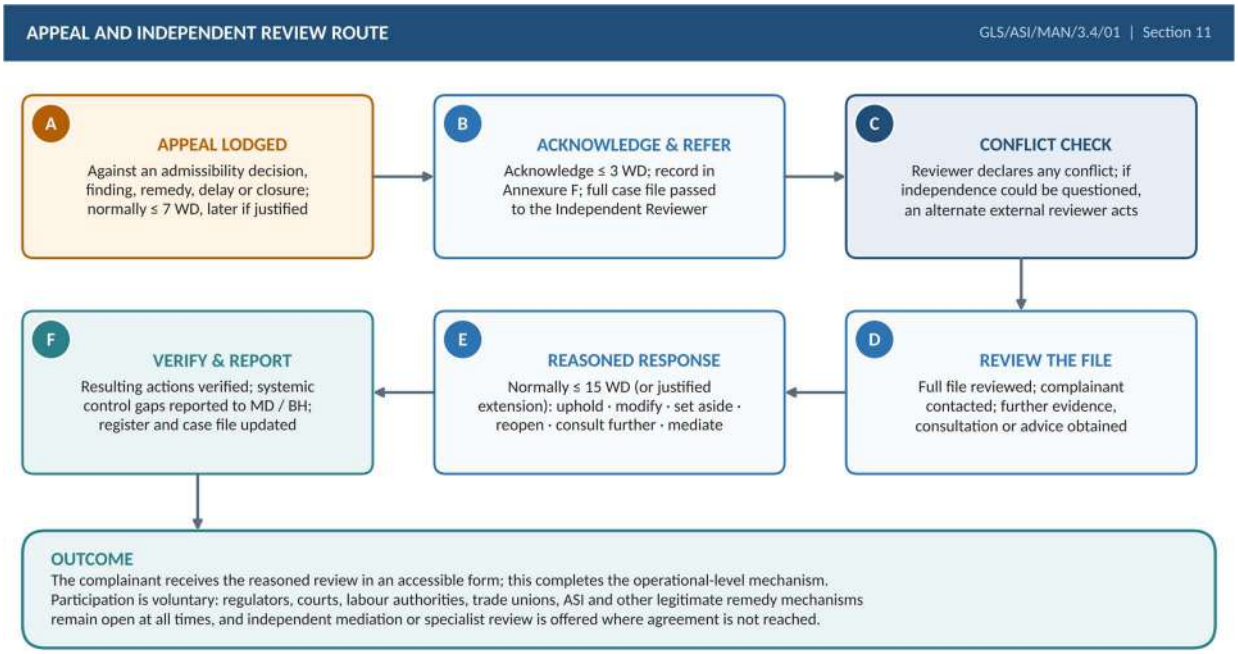


Figure 2 - Appeal and independent review route (Section 11)

ACCESS TO EXTERNAL REMEDY

Use of this mechanism is voluntary and does not prevent any person from approaching a regulator, court, labour authority, trade union, ASI or another legitimate grievance or remedy mechanism.

12. Anonymous Complaints

- Anonymous cases shall be registered, triaged and investigated on the information reasonably available.
- Lack of identity is not a reason for automatic rejection or closure.
- Where feasible, GLS shall provide a secure case code or channel through which an anonymous complainant can receive updates and submit further evidence.
- The investigation shall avoid steps likely to reveal identity unnecessarily or increase retaliation risk.

13. Confidentiality, Privacy and Evidence Security

- Case information is restricted to persons with a defined need to know.
- The complainant's identity and sensitive personal information shall not be disclosed without consent unless required by law or necessary to prevent serious harm; any such disclosure will be limited and documented.
- Electronic files shall be access-controlled; paper files shall be stored in locked custody.
- Public and management reporting shall use aggregated or anonymised information.
- Evidence shall be dated, attributable, legible and protected from alteration or premature destruction.

14. Vulnerable or At-Risk Stakeholders

The Grievance Officer shall identify and remove barriers faced by women, migrant and contract workers, persons with disabilities, low-literacy stakeholders, minorities and any person exposed to economic, cultural, social or physical vulnerability.

- Offer a female contact person for gender-sensitive concerns.
- Accept oral statements and arrange translation or assisted recording.
- Permit a trusted representative, support person or independent adviser.
- Select a safe time and location for engagement and avoid unnecessary travel or cost.
- Apply enhanced confidentiality and safeguarding controls where retaliation or stigma is foreseeable.

15. Requests for Information

RFIs shall be registered and answered accurately, promptly and in a form reasonably understandable to the requester. The responsible function shall verify the response before issue.

- Provide public or non-confidential operational, environmental, social or governance information where available.
- Where information cannot be provided, explain the reason, such as personal privacy, legal restriction, security risk or legitimate commercial confidentiality.
- Consider partial disclosure, summary data or redaction instead of complete refusal.
- Allow the requester to seek review by the Independent Reviewer where the response is disputed.

16. Communication with Affected Populations and Organisations

GLS shall share the mechanism proactively and not rely only on website publication. Communication shall be understandable, culturally appropriate and proportionate to stakeholder access barriers.

- Display the current mechanism and channels at the facility gate and reception.
- Publish the latest approved public version on the GLS website.
- Explain the mechanism during relevant community, contractor, transporter and supplier engagement.
- Provide English and Hindi/local-language summaries and oral explanation where required.
- Seek stakeholder feedback on accessibility and effectiveness during periodic engagement and after case closure.
- Maintain evidence of who was informed, when, how and in what language or format.

17. Public Disclosure

GLS shall publicly disclose the latest approved version of the Complaints Resolution Mechanism. The public version shall, at minimum, state eligibility, scope, access channels, confidentiality and non-retaliation commitments, process stages, indicative timelines, appeal route and the availability of external remedies.

GLS should also disclose an annual anonymised summary showing complaint categories, number received, accepted, not accepted or referred (with grounds), resolved, pending and appealed, types of outcome and follow-up, stakeholder satisfaction, recurring themes and improvement actions. Case identities, sensitive evidence and information that could create retaliation or security risk shall not be disclosed.

A screenshot or archived copy of the webpage, publication date and revision number shall be retained as audit evidence.

18. Monitoring, KPIs and Management Review

Measure	GLS performance expectation	Review frequency
Registration	100% of received complaints and RFIs registered	Monthly
Acknowledgement	>=95% acknowledged within applicable internal target	Monthly
Timely resolution	>=90% closed within agreed or revised target	Quarterly
Overdue cases	Zero cases overdue without approved and communicated extension	Monthly
Retaliation	Zero substantiated retaliation incidents	Immediate / quarterly
Corrective actions	100% of due corrective actions completed or formally rescheduled	Monthly
Stakeholder feedback	>=80% satisfied or partly satisfied where feedback is obtained	Quarterly
Accessibility	All published channels tested and functional	Quarterly

Management review shall consider volumes, categories, severity, locations, stakeholder groups, recurrence, unresolved cases, appeals, response times, remedies, feedback, retaliation allegations, access barriers and systemic corrective actions. Trend results shall inform risk assessments, objectives, procedures, training and stakeholder engagement.

19. Training and Competence

- The Grievance Officer, Case Owners and Independent Reviewer shall understand ASI Criterion 3.4, investigation methods, confidentiality, non-retaliation, Human Rights and dialogue-based resolution.
- Security, reception, supervisors and community-facing personnel shall receive practical intake and escalation training.
- Training shall include scenario exercises for anonymous complaints, serious environmental concerns, vulnerable complainants, retaliation and senior-management conflicts.
- Competence and refresher training records shall be maintained and evaluated for effectiveness.

20. Review and Change Control

Review basis	Timing	Minimum inputs
Routine effectiveness review	At least annually	Trends, stakeholder feedback, channel tests, SLA performance, appeals and corrective actions.
ASI 3.4(c)	At least every five years	Formal review of the complete mechanism; next scheduled full review no later than 05 September 2031.
ASI 3.4(d)	After relevant business change	Expansion, new process, new facility, contractor model, material ESG risk, new community interface or changed Area of Influence.
ASI 3.4(e)	On indication of a control gap	Audit finding, inaccessible channel, delay, unfair outcome, confidentiality breach, retaliation concern, repeated complaint or poor stakeholder feedback.

Reviews shall be documented, include appropriate participation by Affected Populations and Organisations where feasible, identify amendments and responsibilities, obtain approval, update public disclosure and communicate material changes.

21. Records and Retention

Record	Custodian	Minimum retention
Complaint / RFI register and case file	Grievance Officer	At least 7 years after closure
Investigation evidence and interview records	Case Owner / Grievance Officer	At least 7 years after closure
Appeal and independent review records	Independent Reviewer / Grievance Officer	At least 7 years after closure
Corrective action and effectiveness records	Responsible Function	At least 7 years after closure
Communication and public disclosure evidence	EHS / Sustainability	At least 7 years
Mechanism review and approval history	Document Control	Life of document plus 7 years

Longer retention shall apply where required by Applicable Law, contract, permit, litigation hold or continuing remediation. Personal information shall be securely disposed of when retention is no longer justified.

22. Nonconformity and Corrective Action

A missed deadline, unregistered complaint, inaccessible channel, confidentiality breach, retaliation allegation, unsupported closure, repeated root cause or failure to implement remedy shall be treated as a potential control gap. GLS shall record the issue, contain risk, identify root cause, implement corrective action and verify effectiveness. Material gaps shall trigger review of this Manual under Criterion 3.4(e).

23. Audit Evidence

Clause	Expected objective evidence
3.4(a)	Approved mechanism; appointment letters; complaint/RFI register; case files; investigation, remedy and closure evidence; interviews and physical access checks.
3.4(b)	Stakeholder register; gate notice; website; meeting records; contractor/supplier communication; local-language material.
3.4(c)	Five-year review schedule, completed review report, revision history and approval.
3.4(d)	Management-of-change record and post-change mechanism review.
3.4(e)	Audit findings, stakeholder feedback, control-gap CAPA and revised mechanism.
3.4(f)	Current public webpage/download, archived screenshot, publication date and version match.

Annexure A - Stakeholder Complaint / Grievance Form

ACCESS NOTE

This form is optional. GLS must accept oral, anonymous, local-language or free-form submissions even when this form is not used.

Field	Information
Case number	
Date and time received	
Name / organisation (optional)	
Contact and preferred method (optional)	
Anonymous submission	Yes / No
Confidentiality requested	Yes / No; specify any concern
Preferred language / assistance	
Location / activity concerned	
Category	Environment / Community / Human Rights / Labour / Safety / Ethics / Other
Immediate danger or ongoing harm	Yes / No; if yes, action taken

Description of concern

_____

_____

_____

_____

Impact experienced or feared

_____

_____

_____

Requested information, action or remedy

_____

_____

_____

Documents, photographs or witnesses offered: _____

Submitted by / recorded by: _____ Date: _____

Annexure B - Stakeholder Complaints and RFI Register

Maintain electronically with access controls. The following fields constitute the minimum register structure.

Required field	Entry / control
Case ID	
Received date	
Channel	
Complainant type	
Anonymous / confidential	
Category	
Location	
Issue summary	
Criticality	
Immediate protection	
Acknowledged date	
Case Owner	
Independent oversight	
Investigation due	
Resolution due	
Status	
Finding	
Remedy / CAPA	
Appeal	
Closure date	
Feedback	
Effectiveness check	
Public reporting category	
Retention date	
Remarks	

Annexure C - Acknowledgement and Triage Record

Triage field	Assessment
Case number	
Acknowledgement date / method	
Preferred communication confirmed	Yes / No
Confidentiality / safeguarding need	
Immediate danger or material impact	
Classification	Critical / High / Standard / RFI
Within scope	Yes / No / Referral required
Applicable requirements	Law / permit / policy / ASI / contract
Conflict of interest	None / Independent review required
Case Owner	
Target date	
Complainant informed	Date / method

Immediate protective or containment action

_____

_____

_____

_____

Assessed by: _____ Signature: _____ Date: _____

Annexure D - Investigation and Root-Cause Report

Investigation element	Record
Case number / category	
Investigator(s) and competence	
Independence / conflict check	
Issue(s) to be determined	
Applicable requirements	
Evidence reviewed	
Persons consulted / interviewed	
Site inspection / sampling	
Actual and potential impacts	
Finding	Substantiated / Partly substantiated / Not substantiated / Inconclusive
Root cause and contributing factors	
Rights compatibility review	
Systemic or recurring issue	Yes / No; details

Evidence-based analysis and conclusions

_____

_____

_____

_____

_____

_____

Investigator: _____ Signature: _____ Date: _____

Independent review required: Yes / No Reviewer: _____ Date: _____

Annexure E - Remedy, Corrective Action and Closure Form

No.	Action / remedy	Owner	Due date	Evidence / status
1				
2				
3				
4				

Consultation and outcome

Outcome explained to complainant on: _____ Method / language: _____

Complainant response: Accepted / Partly accepted / Not accepted / No response / Anonymous

Reason for disagreement or outstanding concern:

_____

_____

_____

Appeal route explained: Yes / No Appeal submitted: Yes / No

Closure and effectiveness

All actions completed and verified: Yes / No Evidence reference: _____

Effectiveness review date and result: _____

Closed by: Grievance Officer / Independent Reviewer

Name: _____ Signature: _____ Date: _____

Annexure F - Appeal and Independent Review Record

Appeal element	Record
Case number	
Appeal date / appellant	
Decision or delay appealed	
Grounds of appeal / new evidence	
Safeguarding or confidentiality need	
Independent reviewer	Dr. Vijay Sonawane, subject to case-specific conflict check
Conflict declaration	No conflict / Alternate reviewer required
Additional evidence or consultation	
Independent determination	Uphold / Modify / Set aside / Reopen / Refer
Required action and due date	
Response issued	Date / method / language

Reasoned independent review

_____

_____

_____

_____

_____

_____

Independent Reviewer: Dr. Vijay Sonawane

Signature: _____ Date: _____

Annexure G - Request for Information Record

RFI field	Record
RFI number / date	
Requester and contact (optional)	
Information requested	
Responsible function	
Acknowledgement date	
Information available	Full / Partial / Not available
Restriction assessment	Privacy / legal / security / commercial / none
Response / document provided	
Response date / method	
Review requested	Yes / No

Reason for partial disclosure or refusal

_____

_____

_____

_____

Prepared by: _____ Verified by: _____ Date: _____

Annexure H - Stakeholder Communication and Awareness Log

Date	Stakeholder / location	Method	Language / format	Key points	Evidence	Feedback / action

Prepared by: _____ Reviewed by:

_____

Annexure I - Quarterly / Annual Grievance Performance Report

Indicator	Result	Unit
Complaints received		
Requests for information received		
Critical / high cases		
Anonymous cases		
Not accepted / referred (with grounds)		
Acknowledged within target		%
Resolved within target		%
Pending / overdue		
Appeals received		
Substantiated retaliation		
Corrective actions completed		%
Stakeholder satisfaction		%
Channels tested and functional		%

Recurring themes, access barriers and systemic causes

_____

_____

_____

_____

_____

Improvement decisions

_____

_____

_____

_____

_____

Reviewed by management on: _____ Independent Reviewer input: Yes / No

Annexure J - Nil Complaint / Grievance Declaration

Reporting period: _____

GLS Aluminium Industries Private Limited confirms that, based on review of the complaint and RFI register, security and reception records, email and website channels, complaint boxes, stakeholder communications, incident records and management review inputs, the following status applies for the reporting period:

- No stakeholder complaints or grievances were received.
- No material unresolved stakeholder complaint was carried forward from the previous period.
- No allegation of retaliation connected with the mechanism was identified.
- The mechanism remained available, communicated and functional throughout the period.

This declaration does not replace the requirement to maintain, communicate, test, review and publicly disclose the mechanism.

Verified by Grievance Officer: _____ Date: _____

Independently reviewed by Dr. Vijay Sonawane: _____ Date: _____

Approved by Managing Director / Business Head: _____ Date: _____

Annexure K - Mechanism Review Checklist

Requirement	Review question	C / NC / NA	Action / evidence
3.4(a)(i)	Legitimate: authority, impartiality and conflict controls remain effective.		
3.4(a)(ii)	Accessible: channels, languages, anonymity, disability and non-digital access remain adequate.		
3.4(a)(iii)	Predictable: stages, timelines, outcomes, escalation and appeal are understood.		
3.4(a)(iv)	Equitable: stakeholders can access information, advice and support.		
3.4(a)(v)	Transparent: case updates and aggregate reporting are adequate and safe.		
3.4(a)(vi)	Rights-compatible: process and remedies respect Human Rights and do not restrict external recourse.		
3.4(a)(vii)	Learning: trends and case experience result in system improvement.		
3.4(a)(viii)	Dialogue: complainants participate in investigation and resolution.		
3.4(a)(ix)	Scope: all relevant operational complaints, grievances and RFIs can be addressed.		
3.4(b)	Mechanism is shared with Affected Populations and Organisations.		
3.4(c)	Five-year review is completed or scheduled within the required period.		
3.4(d)	Relevant business changes have triggered review.		
3.4(e)	Control-gap indications have triggered review and CAPA.		
3.4(f)	Latest approved version is publicly disclosed and matches the controlled master.		

Review conclusion: Effective / Partly effective / Ineffective

Revision required: Yes / No Target date: _____

Reviewed by: _____ Dr. Vijay Sonawane: _____ Date: _____

Annexure L - Public Notice

GLS WANTS TO HEAR FROM YOU

Stakeholder Complaints, Grievances and Requests for Information

Any person or organisation may raise a concern or request information about GLS operations. Complaints may relate to environment, noise, traffic, safety, community impacts, Human Rights, labour practices, security, ethics, Waste, water, air emissions, biodiversity or other operational matters.

- You may complain in writing, orally, anonymously or through a representative.
- There is no fee. English and Hindi/local-language submissions are accepted.
- There is no time limit for raising a concern.
- Your information will be protected as far as reasonably possible.
- GLS prohibits retaliation against anyone who raises or supports a concern in good faith.
- Using this mechanism does not prevent you from contacting a regulator, court, trade union, ASI or another legitimate mechanism.

Channel	Current contact information
Email	_____
Phone / WhatsApp	_____
Website	_____
Postal / in-person address	_____
Independent review / appeal	Dr. Vijay Sonawane - contact route published by GLS

WHAT HAPPENS NEXT

GLS will register your concern, acknowledge it, assess any urgent risk, investigate fairly, discuss the findings and proposed remedy with you, communicate the outcome and explain the appeal route. Indicative timelines: acknowledgement within 3 working days (sooner for urgent or high-risk concerns); resolution normally within 15 to 30 working days; information requests answered within 15 working days. You may appeal within 7 working days of a decision, or later where there is good reason; the Independent Reviewer normally responds within 15 working days.

Document: GLS/ASI/MAN/3.4/01 | Rev. 00 | Effective 06 September 2026

Annexure M - ASI 3.4 Implementation Evidence Index

Index	Document / record	ASI linkage
01	Approved Stakeholder Complaints, Grievances and RFI Manual	3.4(a-f)
02	Grievance Officer and Independent Reviewer appointment records	3.4(a)(i)
03	Affected Populations and Organisations / stakeholder register	3.4(a)(ix), 3.4(b)
04	Current gate notice, complaint channels and channel-test records	3.4(a)(ii), 3.4(b)
05	Complaint, grievance and RFI register	3.4(a)
06	Acknowledgement, investigation, remedy, closure and appeal case files	3.4(a)
07	Confidentiality, non-retaliation and conflict-control evidence	3.4(a)(i), (vi)
08	Stakeholder communication, consultation and feedback records	3.4(a)(viii), 3.4(b)
09	Training and competence records	3.4(a)
10	Quarterly/annual trend analysis, KPI and management review	3.4(a)(v), (vii)
11	Five-year, business-change and control-gap review records	3.4(c-e)
12	Website publication, screenshot and revision-match verification	3.4(f)
13	Nil complaint declaration, where factually applicable	Supporting evidence only

Reference Links

- ASI Performance Standard: https://aluminium-stewardship.org/asi-standards/performance-standard
- ASI Document Centre: https://aluminium-stewardship.org/knowledge-hub/document-centre
- United Nations Guiding Principles: https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf