GLS ALUMINIUM INDUSTRIES PVT. LTD.

REWARI UNIT, HARYANA

WASTEWATER MANAGEMENT STUDY

Discharge Management | ETP & STP Performance | Spill & Leakage Management

ASI Performance Standard V3.1 - Criteria 6.2 and 6.3

Issue	01
Release	September 2026
Document status	Public disclosure / audit evidence
Prepared for	GLS Aluminium Industries Pvt. Ltd. - Rewari Unit

Public disclosure commitment. GLS commits to make the latest approved version of this report publicly available on the company website and to update it when the plan is formally reviewed or materially revised.

Focused scope: ASI 6.2 Discharges to Water and 6.3 Assessment and Management of Spills and Leakages

Document Control

Control item	Details
Report title	GLS Wastewater Management Study 2026
Facility	GLS Aluminium Industries Pvt. Ltd. - Rewari Unit, Haryana
Issue	Issue 01 / September 2026
Scope	Wastewater generation, routing, ETP/STP treatment, treated-water reuse, discharge management, spill and leakage risk assessment, monitoring, review controls and ASI 6.2/6.3 mapping.
Primary evidence	Integrated water-flow study, ETP/STP operating records, Universal Analytical Lab STP and ETP reports dated 02 May 2026, samples collected 28 April 2026.
ASI basis	ASI Performance Standard V3.1 - Criteria 6.2 and 6.3.
Public disclosure	Latest approved version committed for publication on GLS website.

Contents

1. Executive Summary
2. Scope, Evidence Base and ASI Basis
3. Wastewater Generation, Routing and Reuse
4. Wastewater Discharge Management Plan - ASI 6.2
5. ETP and STP Treatment Performance
6. Wastewater Monitoring, Quantity Accounting and Annual Disclosure
7. Spill and Leakage Risk Assessment - ASI 6.3(a)
8. Spill and Leakage Management Plan - ASI 6.3(b)
9. Plan Review, Change Management and Control-Gap Triggers
10. Practical Implementation Action Plan
11. Public Disclosure Commitment
12. Conclusion
Annexure A - STP Laboratory Report
Annexure B - ETP Laboratory Report
Annexure C - ASI 6.2 and 6.3 Clause Mapping

1. Executive Summary

GLS Aluminium Industries Pvt. Ltd., Rewari operates separate domestic sewage and industrial effluent treatment systems with beneficial reuse of treated water. Sanitary wastewater is treated through the STP and reused for gardening. Industrial wastewater is treated through the ETP and treated effluent is reused for floor cleaning. RO reject, cooling-tower blow-down and softener backwash are routed to the ETP as confirmed by the site utilities team.

Independent laboratory monitoring provides direct evidence of treatment performance. Samples were collected on 28 April 2026 and reported on 02 May 2026. At the sampled condition, the STP and ETP outlet results for pH, COD, BOD, TSS and Oil & Grease were within the limits stated in the laboratory reports. These results are point-in-time evidence and do not replace routine operating control or periodic compliance testing.

This report is structured as the site Wastewater Discharge Management Plan and the site Spill and Leakage Management Plan for the requirements addressed under ASI Criteria 6.2 and 6.3. The approach is intentionally practical: it uses existing treatment plants, operator logs, flow information, inspection, preventive maintenance, spill-control arrangements and third-party testing. Additional equipment is recommended only where existing records cannot provide reliable quantity or control information.

Management area	Current position / commitment
Wastewater stream control	Separate STP and ETP treatment routes established.
Reuse	STP treated water -> gardening; ETP treated effluent -> floor cleaning.
Treatment evidence	Independent STP and ETP inlet/outlet testing available.
Operational evidence	Daily/shift treatment-plant operating records are maintained.
Discharge objective	Maintain controlled treatment and reuse; prevent uncontrolled release.
Spill/leakage objective	Prevent, detect, contain and correct liquid spills or leakages before they affect drains, water or soil.
Plan review	At least every 5 years and earlier after defined events, changes or control gaps.
Disclosure	Latest approved report committed for public availability on GLS website.

2. Scope, Evidence Base and ASI Basis

This study covers the wastewater and liquid-spill controls relevant to ASI Performance Standard V3.1 Criteria 6.2 and 6.3. It does not duplicate the separate water stewardship/hydrological study. The report focuses on practical controls that can be implemented and evidenced at the Rewari facility.

Evidence / source	Use in this report
Integrated water-flow and wastewater study	Wastewater sources, routing, treatment and reuse pathways.
ETP/STP operating records	Routine plant operation, flow information, pH/chemical-dosing and treatment-control evidence.
Universal Analytical Lab - STP report	Independent STP inlet/outlet analytical evidence.
Universal Analytical Lab - ETP report	Independent ETP inlet/outlet analytical evidence.
Site utilities confirmations	RO reject, cooling-tower blow-down and softener backwash routing to ETP.
Site inspection / EHS controls	Drain protection, spill response, housekeeping, bunding/containment and inspection controls.

ASI basis. Criterion 6.2 requires annual quantification/public disclosure of material discharges, a management plan, periodic/event/change/control-gap reviews, and public disclosure of the latest plan. Criterion 6.3 requires assessment of spill/leakage risk areas, a prevention-detection-remediation plan with monitoring, equivalent review triggers, and public disclosure of the latest plan.

3. Wastewater Generation, Routing and Reuse

Wastewater stream	Source	Treatment / route	Controlled destination	Management use
Sanitary wastewater	Toilets / sanitation	STP	Treated-water tank	Gardening
Roll grinder / industrial wastewater	Work Roll Grinder / industrial process	ETP	Treated-effluent tank	Floor cleaning
Process cooling return	Process cooling users identified in site flow study	ETP / treated-effluent system	Treated-effluent system	Controlled reuse where suitable
Cooling-tower blow-down	Cooling-tower system	ETP	Treated-effluent system	Controlled reuse after treatment where suitable
RO reject / concentrate	RO system	ETP	ETP treatment route	Included in wastewater accounting
Softener regeneration / backwash	Softener system	ETP	ETP treatment route	Included in wastewater accounting

The site therefore has two clear beneficial-reuse loops: domestic sewage treatment followed by gardening reuse, and industrial effluent treatment followed by floor-cleaning reuse. RO reject, cooling-tower blow-down and softener backwash are treated as ETP-bound wastewater streams and are included in wastewater accounting rather than treated as unexplained losses.

3.1 Practical wastewater flow

Route	Controlled flow
Domestic route	Sanitary wastewater -> STP -> treated-water tank -> gardening
Industrial route	Industrial/process wastewater -> ETP -> treated-effluent tank -> floor cleaning
Utility wastewater route	RO reject + cooling-tower blow-down + softener backwash -> ETP -> treated-effluent system
Abnormal release	Any unintended overflow, leak or bypass -> immediate containment and incident control under Section 8

4. Wastewater Discharge Management Plan - ASI 6.2

This section constitutes the GLS Wastewater Discharge Management Plan. Its purpose is to minimise exposure to and impacts from wastewater discharges by controlling generation, treatment, monitoring, reuse and abnormal-release response.

4.1 Management objectives

- Maintain effective STP and ETP operation within defined operating and legal requirements.
- Prevent untreated or uncontrolled wastewater release to drains, soil or off-site receptors.
- Maximise safe non-potable reuse of treated water where quality and operational suitability permit.
- Maintain traceable operating records and periodic third-party analytical evidence.
- Account for significant wastewater streams and annual treated-water / discharge quantities using available meters and validated operating records.
- Investigate deviations promptly and implement corrective action proportionate to the event.

4.2 Operational control arrangement

Control	GLS management arrangement
Wastewater segregation and routing	Maintain identified sanitary and industrial routes to STP/ETP; prevent cross-connection with stormwater drains.
Treatment operation	Operate STP and ETP in accordance with operating parameters, chemical dosing requirements and routine log-sheet controls.
Treated-water reuse	Use STP-treated water for gardening and ETP-treated effluent for floor cleaning subject to maintained treatment quality.
Abnormal conditions	Stop/contain abnormal release, protect drains, route recoverable contaminated water to appropriate treatment, investigate cause and restore control.
Laboratory monitoring	Continue independent outlet testing at the frequency required by consent / monitoring plan.
Preventive maintenance	Maintain pumps, pipelines, tanks, valves and treatment equipment to reduce overflow, bypass and leakage risk.
Legal compliance	Maintain applicable consent conditions and environmental legal register; evaluate changes when legal requirements change.

5. ETP and STP Treatment Performance

5.1 STP performance - sample collected 28 April 2026

Parameter	Inlet	Outlet	Report limit	Interpretation
pH	7.40	7.68	5.5-9.0	Within stated limit
COD, mg/L	142.0	56.0	250	Within stated limit
BOD, mg/L	52.5	12.4	30	Within stated limit
TSS, mg/L	124	39	100	Within stated limit
Oil & Grease, mg/L	10.8	<3	10	Within stated limit

Calculated reductions from the reported inlet/outlet values are approximately 60.6% COD, 76.4% BOD, 68.5% TSS and greater than 72.2% Oil & Grease. The treated-water reuse identified for the STP is gardening.

5.2 ETP performance - sample collected 28 April 2026

Parameter	Inlet	Outlet	Report limit	Interpretation
pH	8.12	8.05	5.5-9.0	Within stated limit
COD, mg/L	368.0	152.0	250	Within stated limit
BOD, mg/L	82.4	19.6	30	Within stated limit
TSS, mg/L	56	42	100	Within stated limit
Oil & Grease, mg/L	10.4	4.0	10	Within stated limit

Calculated reductions are approximately 58.7% COD, 76.2% BOD, 25.0% TSS and 61.5% Oil & Grease. The lower TSS reduction should continue to be trended operationally; the sampled outlet value remained within the limit printed on the laboratory report. The treated ETP effluent is reused for floor cleaning.

Interpretation limitation. These results demonstrate performance only for the sampled condition. Continued conformity depends on normal plant operation, maintenance, routine monitoring and applicable regulatory requirements.

6. Wastewater Monitoring, Quantity Accounting and Annual Disclosure

The wastewater management system uses existing operating logs, treatment records, available flow information and independent laboratory testing as the primary evidence base. Additional sub-metering is only necessary where reliable quantities cannot be derived from existing totalisers or validated records.

Monitoring item	Frequency	Acceptance / use	Primary record
ETP/STP operation	Daily / shift as applicable	pH, operating status, chemical dosing, tank/flow information, abnormal conditions	Operator log
ETP/STP outlet quality	As required by consent / monitoring plan	Applicable limits; investigate any deviation	Laboratory report
ETP treated-water quantity / reuse	Daily reading / monthly total	Trend and reconcile treated output and floor-cleaning reuse	Meter / operating record
STP treated-water quantity / reuse	Daily reading / monthly total	Trend and reconcile treated output and gardening reuse	Meter / operating record
RO reject / softener backwash	Per event / monthly summary	Destination to ETP and quantity accounted	Utilities record
Cooling-tower blow-down	Routine / monthly summary	Destination to ETP and quantity accounted	Utilities record
Stormwater / drains	Monthly and pre-monsoon	No visible process-effluent, oil or chemical contamination	Inspection checklist

6.1 Annual wastewater and discharge statement - ASI 6.2(a)

At the end of each reporting year, Engineering/EHS shall consolidate wastewater quantities from available meter totals and validated operating records. The annual statement shall distinguish treated-water reuse from any external discharge. Where no external discharge occurs, "Nil" shall only be reported where supported by the annual records.

Annual reporting item	Unit	Evidence basis
STP influent / sewage treated	KL/year	Operating record / meter, where available
STP treated-water output	KL/year	STP treated-water meter / log
STP treated-water reused for gardening	KL/year	Reuse record / treated-water meter
ETP influent / industrial effluent treated	KL/year	Operating record / meter, where available
ETP treated-effluent output	KL/year	ETP treated-water meter / log
ETP treated effluent reused for floor cleaning	KL/year	Reuse record / treated-effluent meter
RO reject routed to ETP	KL/year or validated estimate	Utilities record
Softener backwash routed to ETP	KL/year or validated estimate	Regeneration / utilities record
Cooling-tower blow-down routed to ETP	KL/year or validated estimate	Utilities record
External discharge, if any	KL/year	Discharge record; otherwise supported Nil

The annual public disclosure will report material discharge information in a concise form. This report does not invent annual quantities that are not available in the evidence set; the year-end statement is to be populated from controlled records.

7. Spill and Leakage Risk Assessment - ASI 6.3(a)

The following assessment identifies the principal liquid-spill and leakage pathways relevant to wastewater management. The rating is qualitative and is intended for site control prioritisation. Existing controls are drawn from the current wastewater study; committed actions are limited to practical inspection, containment and maintenance measures.

Risk area / event	Location / source	Potential receptor	Risk level	Control arrangement
ETP tank / pipeline / pump leakage	ETP area, transfer lines	Drain / soil / local water pathway	Low with controls	Routine inspection; preventive maintenance; drain protection; spill kit; abnormal condition entered in log.
STP overflow / leakage	STP tanks, pumps and lines	Drain / soil	Low with controls	Routine operation checks; level/flow observation; maintenance; immediate containment and correction.
Treatment chemical spill	Chemical storage / dosing point	Drain / soil; air where volatile	Low-Medium	Bunding/secondary containment; controlled dosing; spill kit; housekeeping; operator/EHS response.
Oil / lubricant leakage	Maintenance / utility equipment	Stormwater drain / soil	Low with controls	Containment, housekeeping, drain protection, absorbent/spill kit and repair.
Treated-effluent tank overflow	Treated-water storage / transfer	Drain / soil	Low	Level/flow checks; reuse routing; overflow prevention; prompt corrective action.
RO reject / backwash line leakage	RO / softener wastewater lines	Drain / soil	Low	Route to ETP; inspect transfer lines; account abnormal losses.
Stormwater contamination	External drains / yard	Off-site drainage / soil	Low with controls	Drain segregation; covered storage; monthly/pre-monsoon inspection; remove contamination source immediately.
Unexpected bypass / uncontrolled release	ETP/STP or transfer system	Drain / soil / off-site receptor	Medium - emergency condition	Stop source; isolate drain; contain/recover; notify EHS; investigate and correct before restart.

Risk ratings shall be revisited when the process, chemical inventory, wastewater characteristics, drainage arrangement or control effectiveness changes. Any recurring event or significant control failure shall be treated as a control-gap trigger under Section 9.

8. Spill and Leakage Management Plan - ASI 6.3(b)

The GLS spill and leakage plan uses a simple prevention-detection-response-remediation sequence. The objective is to stop liquid loss at source, protect drains and soil, recover the material where practicable, and correct the cause before normal operation resumes.

Management step	Practical site requirement
Prevent	Maintain tanks, pumps, transfer lines and valves; use bunding/secondary containment where provided; keep chemical and oil storage orderly; maintain drain segregation; avoid temporary hoses or connections that can discharge to stormwater.
Detect	Operator visual checks during routine rounds; review tank/flow abnormalities; inspect floors and drains; use maintenance observations and treatment logs to identify leakage or unexplained loss.
Contain	Stop the source where safe; isolate nearby drains; use available spill kits/absorbents/temporary barriers; prevent spread to soil or stormwater.
Recover / treat	Collect recoverable liquid and route contaminated water to the appropriate treatment system where technically and legally suitable. Manage remaining cleanup material through the site environmental procedure.
Report	Inform the responsible supervisor/EHS; record the event, location, estimated quantity where practicable, immediate action and affected area.
Investigate	Determine cause for repeated, significant or control-failure events; identify corrective and preventive actions.
Remediate	Clean the affected area, repair the failed equipment/control, confirm drain/soil condition is satisfactory, and verify action effectiveness before closure.
Learn / review	Review this plan after any spill/leak event where controls were inadequate, and update risk controls where necessary.

8.1 Roles and records

Role	Responsibility
Operators / Utilities	Operate ETP/STP, maintain logs, report abnormal conditions and initiate immediate safe containment.
Engineering / Maintenance	Maintain tanks, pumps, lines and level/flow controls; repair leakage sources.
EHS	Verify environmental controls, coordinate spill response, maintain incident/CAPA records and legal compliance checks.
Plant management	Provide resources, review significant events and approve plan changes where required.

9. Plan Review, Change Management and Control-Gap Triggers

To avoid separate repetitive procedures, the following review control applies to both the Wastewater Discharge Management Plan and the Spill and Leakage Management Plan.

Review trigger	Timing	Required action
Scheduled review	At least once every 5 years	Engineering/EHS reviews scope, risk assessment, controls, monitoring, responsibilities and current legal requirements.
Discharge-limit exceedance	Immediately after any event exceeding an internally or externally mandated discharge limit	Contain/restore control, investigate cause, implement CAPA and review the affected discharge-management controls.
Spill or leakage event	After any spill/leak event	Review whether prevention, detection, containment and remediation were adequate; update controls where needed.
Business / process change	Before or promptly after a change that alters wastewater or spill/leakage risk	Assess new process, chemical, production load, equipment, storage, drainage or wastewater route and revise controls where required.
Control gap	Whenever a gap is indicated	Examples: repeated abnormal pH/quality, overflow, bypass, failed equipment, recurring leak, contaminated stormwater, missing critical records, audit finding or ineffective corrective action.
Legal / consent change	On change	Update monitoring limits, frequency, operational controls and records as applicable.

Record requirement. The review result shall be recorded in the document-control / management-review record. A revision is required only where the review identifies a substantive change; routine annual data updates may be controlled as annual reporting updates.

10. Practical Implementation Action Plan

No.	Action	Owner	Frequency / target	Expected output
1	Continue daily/shift ETP and STP operating logs and supervisor review.	Utilities / EHS	Ongoing	Traceable operating control.
2	Maintain independent STP/ETP outlet testing as required by consent / monitoring plan.	EHS	As required	Continued compliance evidence.
3	Prepare monthly wastewater quantity summary using existing meters/logs; add sub-metering only where reliable data cannot otherwise be obtained.	Engineering / EHS	Monthly	Practical quantity accounting without unnecessary instrumentation.
4	At year end, consolidate the annual wastewater/discharge statement and identify any material discharge to water.	Engineering / EHS	Annual	ASI 6.2(a) annual quantification basis.
5	Maintain confirmed routing of RO reject, cooling-tower blow-down and softener backwash to ETP and record abnormal losses.	Utilities	Ongoing	Complete wastewater routing and accountability.
6	Maintain stormwater/drain inspections, especially before monsoon, and keep process wastewater segregated from stormwater.	EHS / Utilities	Monthly / pre-monsoon	Prevention of unintended discharge.
7	Maintain practical spill controls: containment, spill kits, drain protection, housekeeping and preventive maintenance.	EHS / Maintenance	Ongoing	Prevention and rapid containment.
8	Record and review every significant spill/leak or discharge deviation; complete RCA/CAPA where a control failure is identified.	EHS / Engineering	Event-based	Learning and control improvement.
9	Apply Management of Change review where a new process, chemical, tank, pipeline, production load or wastewater route changes risk.	Engineering / EHS	On change	Risk remains current.
10	Review this plan at least every five years and on the event/change/control-gap triggers defined in Section 9.	Engineering / EHS / Management	5-year / trigger-based	ASI plan review conformity.
11	Publish the latest approved version of this report on the GLS website and maintain the current approved issue.	Management / Sustainability	On approval / revision	ASI 6.2(g) and 6.3(g) disclosure commitment.

11. Public Disclosure Commitment

GLS Aluminium Industries Pvt. Ltd. commits to publicly disclose the latest approved version of this Wastewater Management Study on the company website. The disclosed report will present the approved management approach for wastewater discharges and spill/leakage prevention and will be updated following formal review or material revision.

Annual material discharge information required under ASI 6.2(a) will be incorporated into the annual reporting update using controlled site records. The public disclosure will distinguish treated-water reuse from any actual external discharge and will avoid unsupported claims where quantitative evidence is not available.

12. Conclusion

GLS Rewari has an established wastewater treatment and reuse arrangement based on separate STP and ETP systems. The available laboratory evidence shows that, at the April 2026 sampling condition, the tested STP and ETP outlet parameters with specified limits were within those limits. Existing beneficial reuse for gardening and floor cleaning provides a practical circularity benefit.

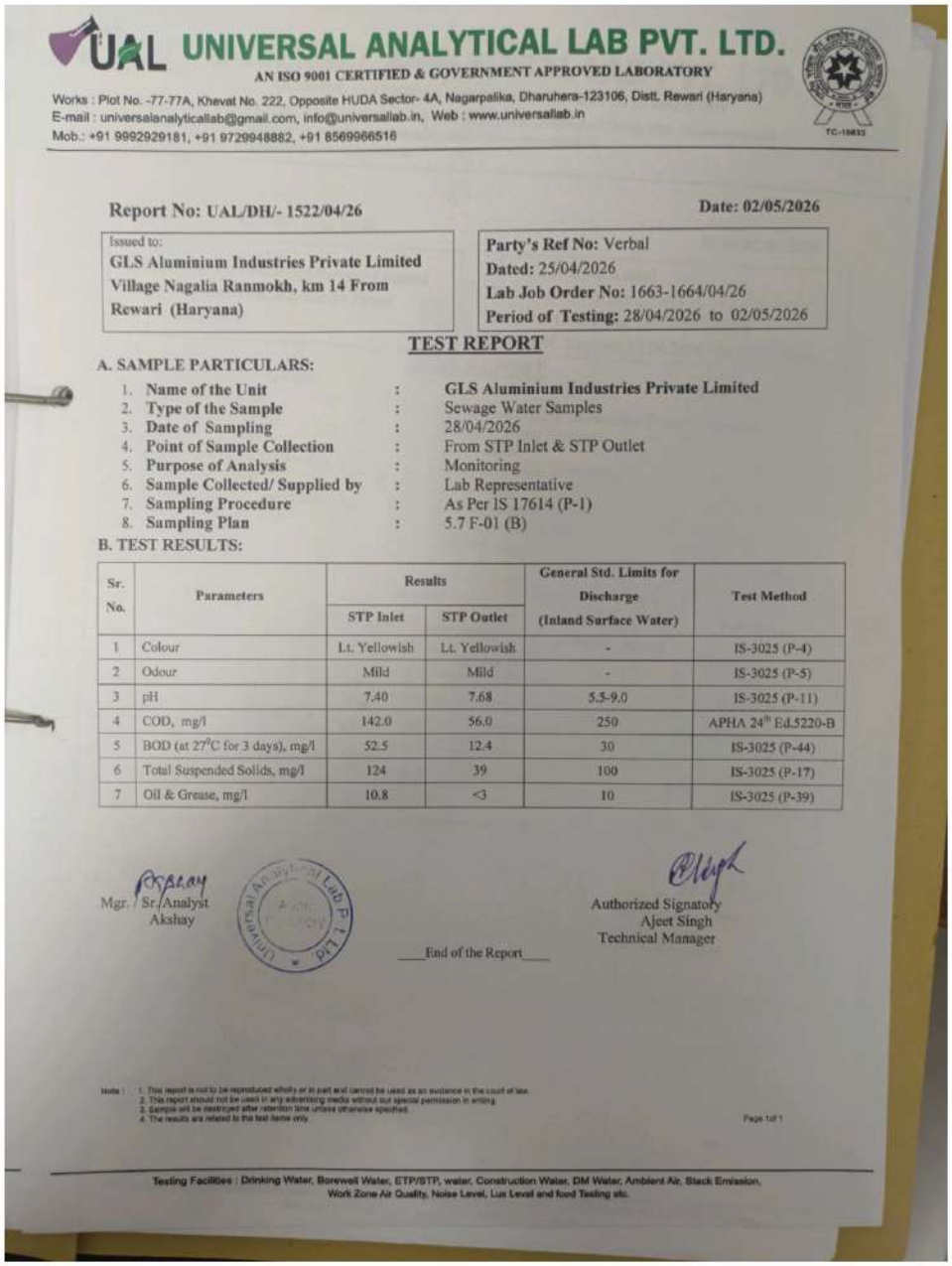
This report strengthens the system by integrating the management-plan elements required for ASI 6.2 and the spill/leakage risk and management-plan elements required for ASI 6.3. The approach deliberately relies

on practical site controls: operating logs, treatment monitoring, available meters, periodic laboratory testing, drain segregation, preventive maintenance, spill containment and defined review triggers.

The principal recurring management task is to maintain reliable quantity and quality records and convert them into monthly and annual wastewater statements. Additional instrumentation should be introduced only where existing meters and validated records are insufficient for reliable accounting. This provides an implementable, proportionate and auditable wastewater-management system for the Rewari facility.

Annexure A - STP Laboratory Report

Universal Analytical Lab Pvt. Ltd. - STP Test Report UAL/DH/-1522/04/26, report dated 02 May 2026; sample collected 28 April 2026.



UAL **UNIVERSAL ANALYTICAL LAB PVT. LTD.**

AN ISO 9001 CERTIFIED & GOVERNMENT APPROVED LABORATORY

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TC-15833

Report No: UAL/DH/- 1522/04/26 **Date: 02/05/2026**

Issued to:
GLS Aluminium Industries Private Limited
Village Nagalia Ranmokh, km 14 From
Rewari (Haryana)

Party's Ref No: Verbal
Dated: 25/04/2026
Lab Job Order No: 1663-1664/04/26
Period of Testing: 28/04/2026 to 02/05/2026

TEST REPORT

A. SAMPLE PARTICULARS:

1. **Name of the Unit** : **GLS Aluminium Industries Private Limited**
2. **Type of the Sample** : Sewage Water Samples
3. **Date of Sampling** : 28/04/2026
4. **Point of Sample Collection** : From STP Inlet & STP Outlet
5. **Purpose of Analysis** : Monitoring
6. **Sample Collected/ Supplied by** : Lab Representative
7. **Sampling Procedure** : As Per IS 17614 (P-1)
8. **Sampling Plan** : 5.7 F-01 (B)

B. TEST RESULTS:

Sr. No.	Parameters	Results		General Std. Limits for Discharge (Inland Surface Water)	Test Method
		STP Inlet	STP Outlet		
1	Colour	Lt. Yellowish	Lt. Yellowish	-	IS-3025 (P-4)
2	Odour	Mild	Mild	-	IS-3025 (P-5)
3	pH	7.40	7.68	5.5-9.0	IS-3025 (P-11)
4	COD, mg/l	142.0	56.0	250	APHA 24th Ed.5220-B
5	BOD (at 27°C for 3 days), mg/l	52.5	12.4	30	IS-3025 (P-44)
6	Total Suspended Solids, mg/l	124	39	100	IS-3025 (P-17)
7	Oil & Grease, mg/l	10.8	<3	10	IS-3025 (P-39)

Mgr. / Sr. Analyst
Akshay

Authorized Signatory
Ajeet Singh
Technical Manager

___End of the Report___

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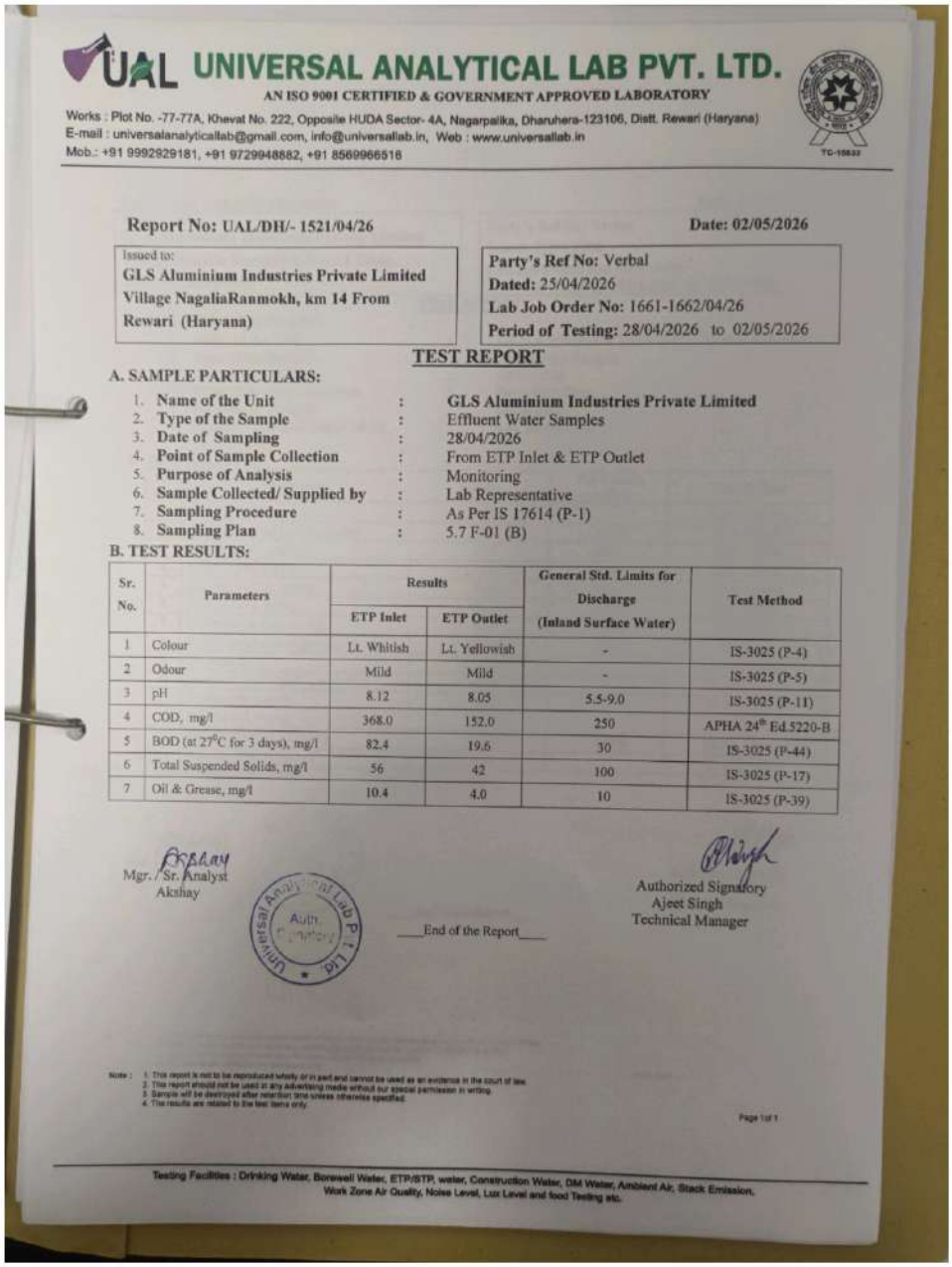
Page 1 of 1

Testing Facilities : Drinking Water, Borewell Water, ETP/STP, water, Construction Water, DM Water, Ambient Air, Stack Emission, Work Zone Air Quality, Noise Level, Lux Level and food Testing etc.

Original third-party laboratory evidence retained for audit traceability.

Annexure B - ETP Laboratory Report

Universal Analytical Lab Pvt. Ltd. - ETP Test Report UAL/DH/-1521/04/26, report dated 02 May 2026; sample collected 28 April 2026.



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AN ISO 9001 CERTIFIED & GOVERNMENT APPROVED LABORATORY

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Report No: UAL/DH/- 1521/04/26 **Date:** 02/05/2026

Issued to:
GLS Aluminium Industries Private Limited
Village NagaliaRanmokh, km 14 From
Rewari (Haryana)

Party's Ref No: Verbal
Dated: 25/04/2026
Lab Job Order No: 1661-1662/04/26
Period of Testing: 28/04/2026 to 02/05/2026

TEST REPORT

A. SAMPLE PARTICULARS:

1. **Name of the Unit** : **GLS Aluminium Industries Private Limited**
2. **Type of the Sample** : Effluent Water Samples
3. **Date of Sampling** : 28/04/2026
4. **Point of Sample Collection** : From ETP Inlet & ETP Outlet
5. **Purpose of Analysis** : Monitoring
6. **Sample Collected/ Supplied by** : Lab Representative
7. **Sampling Procedure** : As Per IS 17614 (P-1)
8. **Sampling Plan** : 5.7 F-01 (B)

B. TEST RESULTS:

Sr. No.	Parameters	Results		General Std. Limits for Discharge (Inland Surface Water)	Test Method
		ETP Inlet	ETP Outlet		
1	Colour	Lt. Whitish	Lt. Yellowish	-	IS-3025 (P-4)
2	Odour	Mild	Mild	-	IS-3025 (P-5)
3	pH	8.12	8.05	5.5-9.0	IS-3025 (P-11)
4	COD, mg/l	368.0	152.0	250	APHA 24th Ed.5220-B
5	BOD (at 27°C for 3 days), mg/l	82.4	19.6	30	IS-3025 (P-44)
6	Total Suspended Solids, mg/l	56	42	100	IS-3025 (P-17)
7	Oil & Grease, mg/l	10.4	4.0	10	IS-3025 (P-39)

Mgr. / Sr. Analyst
Akshay

Authorized Signatory
Ajeet Singh
Technical Manager

Universal Analytical Lab P. Ltd. Auth. Signatory

___End of the Report___

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Page 1 of 1

Testing Facilities : Drinking Water, Borewell Water, ETP/STP, water, Construction Water, DM Water, Ambient Air, Stack Emission, Work Zone Air Quality, Noise Level, Lux Level and food Testing etc.

Original third-party laboratory evidence retained for audit traceability.

Annexure C - ASI 6.2 and 6.3 Requirement Mapping

The table below maps ASI Performance Standard V3.1 Criteria 6.2(a)-(g) and 6.3(a)-(g) to the controls and commitments established in this report. Requirement wording is summarised for audit usability.

ASI clause	Requirement summary	How this report addresses the requirement	Status
6.2(a)	Annual quantification and public disclosure of material discharges to water.	Section 6.1 establishes annual wastewater/discharge statement, quantity basis and year-end disclosure process.	Management mechanism established; annual quantities to be consolidated from controlled records.
6.2(b)	Plan to minimise exposure to and impacts from discharges to water.	Section 4 defines wastewater discharge management objectives, treatment, reuse, monitoring, abnormal-condition and maintenance controls.	Covered in this report.
6.2(c)	Review the discharge plan at least every 5 years.	Section 9 sets a maximum 5-year formal review interval.	Covered.
6.2(d)	Review after a discharge event exceeding internal/external limits.	Section 9 requires immediate review, investigation and CAPA after exceedance.	Covered.
6.2(e)	Review after business changes that alter material discharge risk.	Section 9 applies Management of Change to process, chemical, load, equipment, storage, drainage and wastewater-route changes.	Covered.
6.2(f)	Review on indication of a control gap.	Section 9 defines control-gap indicators including repeated deviation, overflow, bypass, equipment failure, missing critical records and audit findings.	Covered.
6.2(g)	Publicly disclose latest discharge-management plan.	Section 11 records GLS commitment to publish the latest approved version of this report on its website.	Disclosure commitment established.
6.3(a)	Assess major operating areas where spills/leakages could contaminate air, water and/or soil.	Section 7 provides site-specific spill/leakage risk assessment for ETP/STP systems, chemicals, oil, tanks, pipelines, stormwater and abnormal releases.	Covered in this report.
6.3(b)	Implement a prevention, detection and remediation plan with compliance controls and monitoring.	Section 8 establishes prevention, detection, containment, recovery/treatment, reporting, investigation and remediation controls; Section 6 provides monitoring.	Covered in this report.
6.3(c)	Review spill/leakage plan at least every 5 years.	Section 9 applies a maximum 5-year formal review interval.	Covered.
6.3(d)	Review after any spill or leakage event.	Section 9 requires event review and Section 8 requires learning/update where controls were inadequate.	Covered.
6.3(e)	Review after business changes that alter spill/leakage risk.	Section 9 applies Management of Change to relevant process, chemical, equipment, storage, drainage and wastewater changes.	Covered.
6.3(f)	Review on indication of a control gap.	Section 9 defines practical control-gap triggers and corrective-action expectations.	Covered.
6.3(g)	Publicly disclose latest spill/leakage management plan.	Section 11 records GLS commitment to publish the latest approved version of this integrated report on its website.	Disclosure commitment established.

Mapping conclusion. The report provides a practical integrated management framework for ASI 6.2 and 6.3. The only recurring annual completion item is population of the year-end quantitative discharge statement from controlled operating records; no unsupported quantity has been invented in this issue.

ANNEXURE D - WASTEWATER BALANCE AND DISCLOSURE

Technical supplement dated 15 November 2026 | Base data period: calendar year 2024 | Original: Wastewater Management Study, Issue 01, September 2026

D.1 Public availability of the wastewater management plan

The GLS public policies webpage was checked on 15 November 2026. It lists the **GLS Wastewater Management Study, ASI 6.2 / 6.3, Issue 01**, as a published report alongside the Water Management Study. The wastewater study covers wastewater routes, ETP/STP systems, reuse, discharge monitoring and spill/leakage management.

Public source	Publication confirmation
GLS policies page	https://glsaluminium.com/policies.html
Dedicated public wastewater report	https://glsaluminium.com/assets/policies/GLS_Wastewater_Management_Study_ASI_6.2_6.3_Issue_01.pdf
Published wastewater report - page 8	Annual quantity statement lists the required ETP/STP and discharge metrics; actual annual totals are not supplied there.
Published FY 2025-26 sustainability report - page 31	Confirms that total withdrawal, discharge and consumption volumes by source were not included in its evidence pack.

D.2 Evidence available in GLS source studies

Parameter	Source-confirmed information
Water-use baseline (2024)	14,620 KL and 9,162 tonnes of production; 1.596 KL/tonne calculated in separately published Water Management Study, page 4.
Wastewater handling	Industrial process wastewater, cooling blow-down, RO reject and softener backwash routed to ETP; sanitary wastewater to STP (Wastewater Study pages 3 and 5).
Reuse pathways	ETP-treated water for floor cleaning; STP-treated water for gardening (Wastewater Study pages 3, 5 and 7).
Monitoring	ETP/STP output records, discharge accounting and annual reporting format appear in Wastewater Study Section 6, page 8.

Quantity classification. The 14,620 KL water-use baseline is source-reported and is used as the withdrawal proxy for this calculation, pending intake-meter reconciliation. Wastewater totals in the next pages are engineering-calculated from a fully stated water-balance allocation. They are not represented as annual flow-meter readings, regulatory discharge returns or certified treatment records.

D.2A Spills and leakages - reporting-period incident disclosure

For **FY 2025-26 (1 April 2025 to 31 March 2026)**, GLS management confirms that **no wastewater spill or leakage incidents occurred** at the Rewari Unit during the reporting period.

Incident indicator	Reported status
Wastewater spill incidents	0
Wastewater tank/pipeline leakage incidents	0
Remediation cases arising from spill/leak incidents	0

D.3 CALCULATED WATER AND WASTEWATER BALANCE - 2024

Reporting unit: KL/year (equivalent to m3/year). Water-use baseline used as withdrawal proxy: **14,620.0 KL**. All return/recovery coefficients below are engineering allocation inputs to be reconciled with the site's existing records.

Branch / operating factor	Calculation basis	Quantity (KL/y)
Cooling make-up	60% of withdrawal	8,772.0
Sanitary / canteen supply	25% of withdrawal	3,655.0
Other process / utilities	15% of withdrawal	2,193.0
Cooling-tower blow-down to ETP	25% of cooling make-up (approx. 4 concentration cycles)	2,193.0
Sanitary sewage returning to STP	80% of sanitary supply	2,924.0
Process and utility returns to ETP	40% of other utility allocation	877.2
ETP influent - total	Cooling blow-down plus process/utility wastewater	3,070.2
STP influent - total	Sanitary return	2,924.0

D.4 Consolidated quantities - calculated pathway

Indicator	Formula / disposition	KL/year
Total wastewater generated	ETP influent + STP influent	5,994.2
Total wastewater entering treatment	ETP + STP feed	5,994.2
Total treated-water output	95% of each plant's calculated influent	5,694.5
ETP-treated water reused	ETP output assigned to floor-cleaning reuse	2,916.7
STP-treated water reused	STP output assigned to gardening reuse	2,777.8
Total treated wastewater reused	Sum of ETP and STP reuse under full-reuse pathway	5,694.5
External wastewater discharge	Calculated full-reuse pathway only; actual discharge NOT verified	0.0
Treatment loss / sludge-water adjustment	Generated less treated output	299.7

Discharge qualification: The displayed 0.0 KL is a **conditional model result for the full-reuse pathway**. It must not be cited as a verified nil-discharge declaration unless drainage arrangements, treated-water use registers and statutory discharge records support that conclusion.

D.5 WATER-BALANCE CLOSURE AND VALIDATION

Calculation closure follows the same water boundary and period as the original 2024 withdrawal-intensity baseline. Internal cooling-water circulation is excluded from freshwater withdrawal, and treated reuse is not counted as a second new intake.

Water-balance component	KL/year	Calculation
Freshwater withdrawal proxy	14,620.0	2024 reported water-use baseline used for reconciliation
Consumption before wastewater treatment	8,625.8	Withdrawal minus wastewater generation
Losses in ETP/STP treatment	299.7	Generated wastewater minus treated output
Treated water reused and then consumed on-site	5,694.5	ETP floor cleaning + STP gardening
Discharged to an external receptor - model pathway	0.0	Conditional full-reuse result; confirm actual outfalls
Total accounted for	14,620.0	Sum of consumption, treatment loss, reuse end-use and external discharge
Unaccounted difference	0.0	Freshwater withdrawal minus accounted amount

Basic control equation: Withdrawal = pre-treatment consumptive losses + treatment loss + final consumption of reused water + external discharge + change in storage. Change in storage is held at zero for this closed annual engineering reconciliation; actual start/end tank inventories require checking.

D.6 Required confirmation against operating evidence

Evidence / check	Responsibility and required validation
Canal intake totaliser	Utilities: confirm annual opening/closing readings and 2024 total 14,620 KL.
ETP influent and treated-water output	ETP operator / EHS: extract monthly treatment volumes and floor-cleaning reuse from meter totals and logs.
STP influent and treated-water output	STP operator / EHS: extract monthly sewage treatment and gardening reuse from totalisers/logs.
RO reject, softener backwash, cooling blow-down	Engineering: reconcile operating quantities with ETP influent; use defined, recorded calculation factors only when meter readings are unavailable.
Any discharge outfall, bypass or tanker removal	EHS: verify consent conditions, drainage plan, outfall records and incidents before making an annual external-discharge declaration.
Public annual statement	Sustainability/EHS: publish the verified calendar/FY totals with period, boundary, source and calculation method; ensure 2024 is not represented as FY2025-26.

D.7 ASI and GRI reporting interpretation

ASI Performance Standard V3.1 Criterion 6.2 concerns annual reporting of material discharges to water and associated management controls. GRI 303 separates withdrawal, discharge and consumption; recycled/reused internal water is a separate operational indicator and must not be double-counted as additional withdrawal. The final externally disclosed quantities should be based on reconciled records, with any estimation method specifically identified in the data basis.

Document control: This appendix is a later technical supplement. The original 16-page Issue 01 wastewater study and its release date remain unchanged.