

BHARAT FORGE



Conflict Minerals Policy

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INTRODUCTION

Bharat Forge Limited is one of the leading forging companies in the world. Being one of the global leaders in metal processing with a transcontinental presence, our business is dependent on the trust and confidence of our consumers.

Our Company is committed to setting up utmost standards for transparency and accountability in its affairs by behaving responsibly, equitably, and with integrity in all its business dealings and relationships wherever it operates. We operate with the highest moral and ethical standards.

PURPOSE OF THE POLICY

It is observed that some of the valuable natural resources such as tin, tungsten, tantalum and gold (3TG) extracted from the Democratic Republic of Congo or its surrounding countries is affected by appalling activities like massacre and abduction of civilians by armed forces, looting and enrolling of child soldiers. Revenue generated from selling of these natural resources is used to perpetuate the fights. Procuring of such minerals from these distressed regions is equivalent to funding for these inhumane activities.

The term “Conflict Minerals” is defined as columbite-tantalite, also known as coltan (from which tantalum is derived); cassiterite (tin); gold; wolframite (tungsten); or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo (DRC) or an adjoining country.

The purpose of this Policy is to avoid the procurement of such Conflict Minerals. Bharat Forge Limited owns responsibility of materials with full deliberation and takes care to avoid the procurement or usage of such Conflict Minerals in our products.

We support these requirements to further the humanitarian goal of ending the violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region,” which is in the Democratic Republic of the Congo (“DRC”) and neighbouring countries.

SCOPE AND APPLICABILITY

This Policy applies to all sites and individuals working at all levels /grades of Bharat Forge Limited, its subsidiaries, joint ventures, and affiliates anywhere in the world (collectively referred to as the “Company”).

OBJECTIVE

Objectives of the Conflict Mineral Policy are

- To avoid the procurement or usage of conflict minerals which are unlawful, or which are obtained through unethical or otherwise unacceptable means
- Not to allow any violation of human rights conducted in any part of the world for sourcing any raw materials for the manufacturing of our products.
- Make sure that minerals used in our products are from responsible sources
- Deploy responsible procurement practices in our entire supply chain including different tiers
- To make suppliers undertake reasonable due diligence within their own supply chain

POLICY

Bharat Forge shall

- Not source or use any Conflict Minerals (3TG) from DRC or its surrounding countries
- Determine whether there are any Conflict Minerals that are necessary to manufacture a product
- Ensure the product does not contain a Conflict Mineral
- Ensure and review compliance to Conflict Mineral Policy

MONITORING

The Head of Procurement / Processing has primary day-to-day responsibility for implementing this Policy. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand the procedure and, if necessary and appropriate, are given adequate and regular training on it.

If any Supplier or Employee comes across a case of infringement of these guidelines, he/she should bring it to the notice of Business or Functional Heads in writing and the respective person shall take immediate and corrective measures.

AMENDMENTS

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, this Policy, in whole or in part, shall stand modified/amended from time to time, without any further action on the part of the Company, as and when there would be any statutory modification(s) / amendment(s) / revision(s) to the applicable provisions to it.