



CONFLICT MINERAL POLICY (3TG)

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Corporate Office

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Takshi Auto Components – Conflict Mineral Policy (3TG)

Background:

The term “conflict minerals” are defined as the minerals containing columbite-tantalite, also known as coltan (from which tantalum is derived); cassiterite (tin); gold; wolframite (tungsten); or their derivatives from DRC and the adjoining countries viz. Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia. Also, other material originating from Conflict Affected & High-Risk areas as defined by OECD (Organization for Economic Co-operation and Development) Guidance.

It is observed that out of the valuable natural resources these conflict minerals (tin, tungsten, tantalum and gold - 3TG) are extracted from the Democratic Republic of Congo [DRC] and above countries 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. Procurement of such minerals from these distressed regions is equivalent to funding for these inhumane activities.

The purpose of this Policy is to avoid the procurement of such Conflict Minerals. Takshi Auto Components Private 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 neighboring 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:

The 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.

Takshi Auto Components Private Limited is committed to:

- 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
- Encourage our Suppliers to Source material responsibly & avoid the procurement of Conflict Minerals which will be used in our products, processes, and services.
- Identify, assess, and support suppliers to explore alternate source for the Conflict minerals.

Takshi Auto Components Private Limited expects suppliers to:

- Comply with the Conflict minerals reporting requirement & conduct due diligence of their own supply chain in alignment with internationally recognized framework such as OECD guidance.
- Report the source of the conflict minerals used in their processes and or included in their parts supplied to Takshi Auto.
- Ensure and review compliance to conflict mineral policy in line with Takshi Auto's code of conduct. Adherence to policy is responsibility of every person under purchasing domain.

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.

Managing Director

Amol Patel