Steel Strips Wheels Limited

CONFLICT MINERAL POLICY

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Classification: Internal

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1. Purpose

Steel Strips Wheels Limited (SSWL) is committed to responsible business conduct and ethical supply chains. This Conflict Minerals Policy (Policy) defines SSWL's approach to identifying and addressing risks associated with the sourcing of certain minerals that may directly or indirectly finance armed groups or contribute to human rights abuses in conflict-affected and high-risk areas (CAHRAs).

This Policy is intended to function as a compliance document (supplier onboarding, contractual flow-down, and risk controls) and also as supporting evidence for EcoVadis under Sustainable Procurement, with cross-alignment to Ethics and Labor & Human Rights.

2. Scope and Applicability

This Policy applies to SSWL's procurement of raw materials, components, parts, consumables, tools, services, and subcontracted operations where applicable, and to all suppliers, contractors, subcontractors, agents, intermediaries, and other business partners ("Suppliers") providing goods/services to SSWL.

SSWL recognizes that conflict minerals risks may exist deep within multi-tier supply chains. Therefore, Suppliers must extend relevant requirements of this Policy to their own sub-tier suppliers involved in goods/services supplied to SSWL and take reasonable measures to ensure compliance.

3. Definitions

For the purpose of this Policy:

1. Conflict Minerals (3TG): Tin, Tantalum, Tungsten and Gold (commonly referred to as "3TG"), its ores and 3TGs & metals/minerals (Lithium, Cobalt, Mica, Nickle, Tungsten, etc.) associated with conflict minerals due diligence expectations.
2. CAHRAs: Conflict-Affected and High-Risk Areas—regions characterized by armed conflict, widespread violence, or other risks of severe harm such as forced labour, child labour, or gross human rights abuses.
3. Covered Countries (DRC region concept): The Democratic Republic of the Congo (DRC) and adjoining countries as commonly referenced in conflict minerals due diligence expectations and reporting frameworks.

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4. RMI / RMAP / CMRT: Industry tools and assurance mechanisms widely used for upstream transparency, including the Responsible Minerals Initiative (RMI), the Responsible Minerals Assurance Process (RMAP), and the Conflict Minerals Reporting Template (CMRT).

4. Policy Commitments

SSWL commits to:

- Responsible sourcing: Take risk-based steps to avoid sourcing 3TGs & metals/minerals (Lithium, Cobalt, Mica, Nickle, Tungsten, etc.) that directly or indirectly finances armed groups or contributes to serious human rights abuses.
- Due diligence: Implement a due diligence approach aligned with internationally recognized expectations for minerals sourced from CAHRAs (including OECD-aligned approaches).
- Supplier accountability: Require Suppliers to support traceability and due diligence through information sharing, sub-tier flow-down, and corrective actions where risks are identified.
- Transparency: Maintain appropriate documentation and, where relevant, provide information to customers and stakeholders consistent with legal/contractual requirements.

5. Due Diligence Framework (Risk-Based Approach)

SSWL applies a risk-based due diligence approach broadly aligned to the OECD five-step framework, adapted to SSWL's supply chain context:

5.1 Step 1: Establish Internal Governance

- Define responsibilities across Procurement, Compliance, ESG/EHS and Quality.
- Embed conflict minerals expectations in supplier onboarding, purchase orders, contracts, and supplier codes/terms (as applicable).

5.2 Step 2: Identify and Assess Supply Chain Risks

- Conduct supplier mapping and determine which supplied items may contain 3TG (directly or through components) & metals/minerals (Lithium, Cobalt, Mica, Nickle, Tungsten, etc.).
- Prioritize suppliers based on category risk, geography risk, and supply criticality.

5.3 Step 3: Respond to Identified Risks

- Implement mitigation measures (e.g., corrective action plans, enhanced due diligence, alternate sourcing).

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- Escalate unresolved high-risk cases as per Section 9 (Corrective Actions and Consequences).

5.4 Step 4: Independent Assurance (Where Applicable)

Where relevant and feasible, SSWL encourages sourcing through smelters/refiners that are validated by recognized assurance programs (e.g., RMAP Conformant).

5.5 Step 5: Reporting and Communication

SSWL will maintain evidence records; provide customer-facing responses where contractually required.

6. Supplier Minimum Requirements

Suppliers must comply with the requirements below and applicable laws:

6.1 Compliance and Cooperation

- Comply with applicable laws and customer requirements related to conflict minerals and responsible sourcing.
- Provide accurate, complete and timely information when requested by SSWL (including sub-tier information where relevant).

6.2 Responsible Sourcing Controls

- Implement controls to identify whether supplied products/materials contain 3TG & metals/minerals (Lithium, Cobalt, Mica, Nickle, Tungsten, etc.).
- Perform due diligence on their own supply chains for 3TG & metals/minerals (Lithium, Cobalt, Mica, Nickle, Tungsten, etc.) and flow down these requirements to relevant sub-tier suppliers.

6.3 Disclosure and Reporting (CMRT or Equivalent)

- Upon request, submit a completed CMRT (or equivalent declaration) and supporting evidence as needed.
- Provide smelter/refinery information and country of origin data where ever available and relevant.

6.4 Smelter/Refinery Expectation (Risk-Based)

Where feasible and relevant, Suppliers are expected to source 3TG & metals/minerals (Lithium, Cobalt, Mica, Nickle, Tungsten, etc.) through smelters/refiners conformant with recognized assurance programs (e.g., RMAP Conformant) and be able to substantiate this with documentation.

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6.5 Prohibited Practices

Suppliers must not:

- falsify documents or provide misleading origin/smelter information;
- obstruct audits or refuse reasonable verification requests;
- retaliate against workers raising concerns related to sourcing, labor conditions, or ethics.

7. Verification, Audits and Evidence

SSWL may verify compliance through one or more of the following (risk-based): document reviews (policies, CMRT, smelter lists, invoices/traceability records), supplier self-assessments, management interviews, third-party assessments and/or on-site audits (announced and legally permissible). Suppliers must maintain auditable records and cooperate with reasonable verification activities.

8. Grievance Mechanism and Non-Retaliation

Suppliers must maintain a grievance mechanism accessible to workers and stakeholders and ensure non-retaliation for good-faith reporting. Suppliers are expected to investigate concerns and implement remediation actions.

9. Corrective Actions and Consequences

If non-compliance is identified, Suppliers must implement corrective actions within agreed timelines, including root-cause analysis and evidence-based closure. Depending on severity and recurrence, SSWL may take actions including enhanced due diligence and time-bound corrective action plans, suspension of new orders, removal from approved supplier lists, contract termination, and/or escalation to authorities where required by law or contract.

10. Governance and Responsibilities

Responsibilities under this Policy include:

- Procurement & Supply Chain: supplier onboarding, contractual clauses, risk screening, CMRT collection, supplier engagement.
- Legal & Compliance: policy oversight, ethics escalation, investigations, integrity due diligence (agents/intermediaries).

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- ESG/EHS: Conflict affected and high risk area inputs, human rights/environment risk linkage, supplier capacity building.
- Quality: product traceability alignment and supplier performance integration.
- Internal Audit/Risk: periodic control review and assurance of the program design and operation.

11. Training and Supplier Engagement

SSWL may provide awareness and guidance to targeted suppliers. Suppliers are expected to train relevant personnel responsible for sourcing, compliance, and supplier management on conflict minerals due diligence expectations.

12. Review and Updates

This Policy will be reviewed at least once every two year or earlier based on changes in legal requirements, customer expectations, supply chain risk profile, or material incidents.

Annexure A: Supplier Declaration (Template)

This letter serves as an acknowledgement that [Company Name] _____ ("Supplier") Responded to a conflict minerals survey in a manner that indicated that Supplier is not supplying any product, part or material to SSWL that contains any conflict mineral.

In the event that Supplier learns that it is in fact utilizing conflict minerals in any Product, part or material being provided to SSWL, Supplier should inform SSWL immediately and shall thereafter complete any necessary due diligence requested by SSWL so that SSWL may comply with its Securities and Exchange Commission reporting require.

- Authorized Signatory: _____
- Name/Designation: _____
- Signature & Seal: _____
- Date/Place: _____

Prepared By:	Approved By:
HOD-EHS & ESG	Dy. Managing Director

** End of Document**

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