



Conflict Minerals Policy

Gravita Conflict Minerals Policy

1. Purpose

Gravita is committed to the responsible sourcing of conflict minerals like Tin, Tantalum, Tungsten, Gold (3TG) ensuring that it does not finance directly or indirectly armed conflicts or contribute to human rights abuses in the Democratic Republic of Congo (DRC), its adjoining countries, or other Conflict-Affected and High-Risk Areas (CAHRAs). The U.S. Securities and Exchange Commission (SEC) adopted rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. This policy outlines our approach to ethical procurement and due diligence.

2. Scope

This policy applies to Gravita’s global business operations. Employees whose responsibilities relate to the sourcing of parts, components, and materials are informed and are expected to assist with our compliance with these requirements, associated legislation, and regulations. This policy is reviewed annually and changes are incorporated accordingly.

3. Our Commitment

Gravita,

- Sources conflict minerals responsibly, ethically, and legally, free from links to conflict or human rights abuses.
- Complies with all relevant laws and international standards.
- Ensures transparency and traceability in the supply chains.

4. Supplier Requirements:

- Suppliers must ensure the conflict minerals are sourced legally and ethically, in line with Gravita’s standards.
- Must support due diligence by sharing origin and handling details.
- Must promptly report any sourcing concerns or violations.

5. Due Diligence Process:

Gravita will,

- Monitor conflict mineral suppliers and sourcing locations, especially in regions like Tanzania.
- Avoid conflict minerals from conflict-affected or high-risk areas.
- Discontinue suppliers who don’t meet ethical sourcing standards.

6. Governance

The ESG and Procurement teams oversee the implementation of this policy, monitor compliance, and report on responsible sourcing practices related to conflict mineral procurement.

Approved by

Mr. Yogesh Malhotra

(CEO & WTD, Gravita India Limited)