

# Conflict Minerals Policy

## Melux Control Gears Private Limited

### Introduction

Melux Control Gears Private Limited (hereafter referred to as "Melux") is committed to conducting business ethically and responsibly. Our commitment extends to ensuring that our operations and supply chain do not contribute to human rights abuses, environmental harm, or conflicts in regions where certain minerals are sourced.

This Conflict Minerals Policy outlines our stance, expectations, and actions related to the sourcing and use of minerals that are considered "Conflict Minerals" under international regulations, including but not limited to the Dodd-Frank Wall Street Reform and Consumer Protection Act (2010).

### Scope

This policy applies to all employees, suppliers, contractors, and other stakeholders involved in the procurement, production, and distribution of products and components for Melux.

### Definition of Conflict Minerals

Conflict Minerals refer to tin, tantalum, tungsten, and gold (collectively known as "3TG") that are mined in conditions of armed conflict and human rights abuses, primarily in the Democratic Republic of Congo (DRC) and adjoining regions.

### Policy Statement

#### 1. Commitment to Ethical Sourcing

- Melux will strive to source minerals responsibly and ensure that Conflict Minerals used in our products do not directly or indirectly finance or benefit armed groups in Conflict-Affected and High-Risk Areas (CAHRAs).

#### 2. Compliance with Regulations

- We are committed to complying with applicable laws and regulations regarding Conflict Minerals, including the Dodd-Frank Act and European Union regulations.

#### 3. Supplier Expectations

- Suppliers must conduct due diligence to ensure that minerals used in their products supplied to Melux are responsibly sourced.
- Suppliers are required to disclose the origin of the 3TG minerals and provide supporting documentation when requested.
- Preference will be given to suppliers who source materials from smelters and refiners certified as conflict-free by recognized programs, such as the Responsible Minerals Assurance Process (RMAP).

#### 4. Due Diligence

- Melux will implement a robust due diligence process in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs.

- This includes identifying, assessing, and mitigating risks associated with the use of Conflict Minerals in our supply chain.

#### **5. Reporting and Transparency**

- Melux will ensure transparency by reporting our Conflict Minerals due diligence efforts in an annual Conflict Minerals Report.
- The report will be made available to stakeholders, customers, and regulatory bodies as required.

#### **6. Training and Awareness**

- Employees and suppliers will be provided with adequate training to understand the implications of Conflict Minerals and Melux's expectations for ethical sourcing.

#### **7. Continuous Improvement**

- Melux is committed to continuous improvement of our Conflict Minerals program and will regularly review and update this policy to reflect changes in regulations, industry practices, and stakeholder expectations.

#### **Non-Compliance**

Suppliers who fail to comply with this policy or who are found to be sourcing Conflict Minerals from unethical or illegal sources may face termination of business relationships with Melux.

#### **Contact Information**

For questions, concerns, or to report violations of this policy, stakeholders can contact:

**Email:** [qa@melconindia.com](mailto:qa@melconindia.com)

**Phone:** +91-9356284364

#### **Approval and Review**

This policy has been approved by the Board of Directors of Melux Control Gears Private Limited and will be reviewed annually or as required to ensure its relevance and effectiveness.

**Effective Date:** 29.12.2023

**Review Date:**