

HR Dept.	KALYANI TECHNOFORGE LTD	Revision 00
		Prepared Date- 01-04-2025
		Next Revision -01-05-2026



	Prepared By	Reviewed By	Approved By
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<b>Designation</b>	Executive Sustainability	Dy. Manager Sustainability	General Manager
<b>Sign</b>			
<b>Date</b>	01.04.2025	01.04.2025	01.04.2025

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## Conflict Mineral Policy

### INTRODUCTION

Kalyani Technoforge Ltd (formerly known as Kalyani Thermal Systems Ltd.) is a part of KALYANI GROUP under Bharat Forge as the flagship Company. With a successful journey spanning across 5 decades, Kalyani Group is a globally renowned conglomerate with an annual turnover of over US\$3 Billion. Worldwide, it has 15+ leading companies across various industries like Engineering Steel, Automotive, Industrial, Renewable Energy, Urban Infrastructure and Specialty Chemicals. A strong engineering global workforce of 10,000 adds to the many strengths of the group.

Kalyani Technoforge Limited (Formerly known as Kalyani Thermal Systems Ltd) was established in 1979 to carry out furnace building activities. KTFL brought forging business into focus in the year 2001 to support small forging requirement of automotive business when automobile component localization program was initiated by various automobile companies and later supported passenger car business. Kalyani Thermal Systems earlier was a combination of furnace and forging business which was separated in the year 2013 as Kalyani Technotherm ltd which focused on furnace business and Kalyani Technoforge Ltd. which focused on forging activities.

In the year 2001, the company had installed capacity of 600 MT of forging. Since then the company has seen a steady growth and now has installed capacity of 42,000 MT.

Kalyani Technoforge Limited has established its manufacturing facilities at Mundhwa (Pune), Ranjangaon, Chakan, Baramati, Jejuri, Khed, Ambethan, Bhiwadi and Gujarat in India.

In the year 2019, January our Ranjangaon, Mundhwa and Chakan plant and in year 2020 Heat Treatment plant were awarded with prestigious JIPM Awards for commendable work in Forging and Heat Treatment process in each plant.

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



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Democratic Republic of the Congo (DRC) or an adjoining country.

The purpose of this Policy is to avoid the procurement of such Conflict Minerals. Kalyani Technoforge 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.

In addition, on minerals reporting, in October 2021, additional minerals were added by RMI as EMRT "Extended Mineral Reporting". This reflects concern about the human and environmental impacts of mining minerals such as cobalt and mica.

The EMRT enables companies to report minerals beyond 3TG. Right now, the EMRT specifically addresses cobalt and mica, but the template can be used for other minerals as well.

## SCOPE AND APPLICABILITY

This Policy applies to all sites and individuals working at all levels /grades of Kalyani Technoforge 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

Kalyani Technoforge Limited shall

- Not source or use any Conflict Minerals (3TG) or Extended Minerals from DRC or its surrounding countries
- Determine whether there are any Conflict Minerals or Extended Minerals that are necessary to manufacture a product

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- Ensure the product does not contain a Conflict Mineral or Extended Minerals
- 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.

## Abbreviations

HT -Heat Treatment

DRC-Democratic Republic of the Congo

3TG-Tin, Tungsten, Tantalum and Gold

RMI-Rocky Mountain Institute

CMRT-Conflict Minerals Reporting Template

EMRT-Extended Mineral Reporting Template

KTFL: Kalyani Technoforge Ltd

**Annexure:** Nil

## Revision History

Revision No.	Rev. Date	Change Summary	Approved by
00	01.04.2025	Initial Prepared Policy	Subhashis Banerjee