

 <p>POLICY (GLOBAL)</p>	VARROC CONFLICT MINERALS POLICY	
	Document #: VE/EBU/R&D_PD/F006 Reference: IATF 16949 ISO 9001	Revision: 02 Date: 2024-05-20
	Originator: H&S	

Varroc Engineering Ltd. Conflict Minerals Policy

In response to violence and human rights violations in the mining of certain minerals from the "Conflict Region", which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries, EU Commission and U.S. Securities and Exchange Commission (SEC) has adopted rules to implement reporting and disclosure requirements related to "conflict minerals," as set by the Organization for Economic Co-operation and Development (OECD). The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain "conflict minerals" that are "necessary to the functionality or production" of those products.

The definition of "conflict minerals" refers to gold, cobalt, mica as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State and EU Commission may designate other minerals in the future. We support the humanitarian goal of ending violent conflict in the DRC and surrounding countries.

Varroc Engineering Ltd. is committed to the responsible sourcing of "conflict minerals" throughout our supply chain and to continuing to comply with the underlying SEC rules and regulations surrounding "conflict minerals". We strive to work cooperatively with our customers and supply chain partners in implementing conflict minerals compliance programs.

Our supply chains are required to use validated DRC conflict free smelters and refiners for procurement of Tin(Sn), Tungsten(W), Tantalum(Ta), Gold(Au), Cobalt(Co) and Mica(Silicate Content) contained in Varroc products. Our suppliers are required to conduct due diligence to understand the source of the conflict minerals used in Varroc products, source responsibly, and not knowingly provide products containing minerals that contribute to conflict as described in the Rule.

Varroc supports the goal of ending violence, human rights violations and environmental devastation in the Conflict Region. We are committed to complying with any requirements applicable to our Company under the Conflict Minerals Rule. We will reconsider our willingness to partner with suppliers that fail to comply with this Policy.

Varroc requires all our production suppliers to provide us with completed conflict minerals declarations using Conflict Minerals Reporting Template (CMRT) and Extended Mineral Reporting Template (EMRT) to Varroc annually as per latest Responsible Minerals Initiative practice.

*[Standards \(responsiblemineralsinitiative.org\)](https://standards.responsiblemineralsinitiative.org)



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Record of Revision:

Date	Revision No	Description of change	Created by	Approved by
18-Oct-2023	01	Conflict Minerals Templates updated (CMRT and EMRT)	Jewel Mishra	Mohammad R. Parvaiz
20-May-2024	02	Specific RMI standard link is added (*)	Asha Srinivasa	Mohammad R. Parvaiz

