



Conflict Minerals Policy

Abilities India Pistons & Rings Ltd

GT Road Giani Border Post-Chikamberpur, Ghaziabad UP-201006

POLICY REVISION INFORMATION

Document No.	Issue No. & Date	Implementation Date	Communicated To
POLICY/AIP/029	01 (01.07.2025)	01.07.2025	All Stakeholders, All employees and Contractors, Supplier etc.

ISSUE HISTORY INFORMATION

4.			
3.			
2.			
1.	01.07.2025		New Release
Issue No.	Issue Date	Amendment History	

Proposed By	Approved By
CONTROLLED COPY, DATE- 01.07.2025	
HRD	Managing Director

TITLE: - Guidelines for Conflict Minerals

1. Policy Statement

Abilities India Pistons & Rings Ltd (AIP) is committed to responsible sourcing of minerals and supports efforts to eliminate the use of **conflict minerals** that directly or indirectly finance or benefit armed groups or contribute to human rights abuses.

The Company aims to:

- Ensure responsible and ethical sourcing of raw materials
- Promote transparency across the supply chain
- Comply with applicable regulatory and customer requirements

2. Scope

This policy applies to:

- All suppliers and vendors providing materials, components, or products
- All procurement activities involving minerals and metals
- Internal teams involved in sourcing and supply chain management

3. Definition of Conflict Minerals

Conflict minerals include:

- **Tin, Tungsten, Tantalum, and Gold (3TG)**

These minerals may originate from **conflict-affected and high-risk areas (CAHRAs)** and are associated with:

- Armed conflict
- Human rights abuses
- Environmental degradation

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4. Policy Commitments

4.1 Responsible Sourcing

AIP is committed to:

- Avoid sourcing minerals that:
 - Directly or indirectly finance armed groups
 - Contribute to human rights violations
 - Promote sourcing from **responsible and verified supply chains**
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4.2 Supply Chain Due Diligence

The Company shall:

- Implement a **risk-based due diligence process** aligned with OECD guidance
 - Identify and assess risks in the mineral supply chain
 - Take appropriate mitigation actions where risks are identified
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4.3 Supplier Expectations

Suppliers are required to:

- Source minerals responsibly
 - Avoid procurement from conflict-affected or high-risk sources unless verified as conflict-free
 - Provide information on the origin of minerals upon request
 - Maintain traceability of materials in their supply chain
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4.4 Transparency & Disclosure

- Suppliers must:
 - Disclose sourcing practices
 - Provide declarations (e.g., CMRT – Conflict Minerals Reporting Template)

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- AIP shall maintain transparency with customers and stakeholders
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4.5 Risk Mitigation

In case of identified risks:

- Engage with suppliers to:
 - Implement corrective action plans
 - Consider:
 - Suspension or termination of suppliers in case of non-compliance
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4.6 Continuous Improvement

- Work with suppliers to:
 - Improve traceability and transparency
 - Encourage adoption of:
 - Responsible sourcing certifications and frameworks
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5. Governance & Responsibility

- **Top Management:** Oversight and strategic direction
 - **Procurement Team:** Supplier engagement and compliance
 - **ESG/EHS Team:** Risk assessment and monitoring
 - **Suppliers:** Compliance with policy requirements
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6. Compliance & Reporting

- Ensure compliance with:
 - Customer requirements (especially OEMs in automotive sector)
 - International responsible sourcing frameworks
- Maintain records and documentation for:
 - Supplier declarations

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- Due diligence processes
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7. Non-Compliance

Failure to comply with this policy may result in:

- Corrective action plans
 - Suspension or termination of business relationships
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8. Review & Updates

- Policy reviewed periodically
 - Updated based on:
 - Regulatory changes
 - Industry best practices
 - Business requirements
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9. Conclusion

AIP is committed to ensuring that its supply chain is **free from conflict minerals contributing to human rights abuses**, while promoting responsible sourcing and sustainable business practices

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