



Exide Industries Limited (EIL)
Responsible Mineral Sourcing Policy



RESPONSIBLE MINERAL SOURCING POLICY

Introduction

Background: Conflict Minerals refer to Tin, Tungsten, Tantalum, and Gold (3TG) usually sourced from the Democratic Republic of Congo (DRC) and adjoining countries including Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. These minerals may be associated with human rights abuses such as child labor, forced labor, and funding of armed conflict. Exide Industries Limited prioritizes economic growth with environmental and social responsibility in its global supply chain.

Purpose of the Policy: Guiding Exide's procurement, this policy outlines our approach to and commitment to responsible sourcing of minerals, particularly Tin, Tungsten, Tantalum, and Gold (3TG), in a manner that does not facilitate armed conflict or human rights abuses, aligning with global standards and regulatory expectations.

Scope of the Policy:

- All suppliers and vendors within Exide's global supply chain.
- All materials incorporated into Exide's batteries, components, and manufacturing inputs.
- Both indirect and direct supply relationships.

2. Policy Statement

Commitment to Responsible Mineral Sourcing: Exide is committed to source Tin from only duty-free, conflict free and non-high risk countries.

3. Supplier Expectations

In line with the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**, Exide commits to:

- **Conducting Supply chain mapping and risk assessment** - Suppliers are expected to comply with Exide's Responsible Minerals Sourcing Policy and shall undergo due diligence in alignment with internationally recognized frameworks such as OECD guidelines, CMRT & EMRT requirements and RMI standards.
- **Supplier response verification** - The suppliers must report the source of minerals supplied to Exide Industries Ltd. via provision of certificate of origin and other due diligence documents (as applicable). Additionally, suppliers must also provide a



declaration with each supply confirming adherence to CMRT/EMRT guidelines and that materials are not sourced from conflict-affected or high-risk zones/regions.

- **Audits and Assessments** - Exide shall conduct regular audits and assessments of supplier practices. We may engage third-party verification and require documentation to ensure compliance. Procurement teams are trained to identify risks and ensure adherence to this policy. As a mandatory requirement, all suppliers and trade houses are requested to complete the designated template detailing smelter information, in accordance with the Responsible Minerals Initiative (RMI) guidelines.
- **Corrective actions** - Suppliers are expected to complete comprehensive due diligence reporting, including traceability surveys, and commit to corrective action plans where risks or non-compliances are identified. They must participate in recognized certification or audit programs such as RMAP or CFS and actively support capacity-building initiatives to enhance responsible sourcing practices and compliance across the supply chain.
- **Declarations:** Provide a declaration with each supply confirming adherence to CMRT/EMRT guidelines and that materials are not sourced from conflict-affected or high-risk zones/regions.

4. Risk Management Approach

Exide Industries is committed to proactively managing risks associated with conflict minerals by developing targeted risk mitigation and remediation plans for identified supply chain issues. Although the company is committed to sourcing Tin only from duty free and risk-free zone as a practice, however, whenever necessary, the Company shall investigate and evaluate alternative sourcing options outside of conflict-affected and high-risk areas to ensure responsible and ethical procurement practices.

5. Reporting Mechanism

Violation reporting: Any employee or supplier who identifies a potential violation of this policy must report it to the Chief Procurement Officer (CPO) and Procurement team - procurement@exideindustries.com. Reports will be handled confidentially and investigated promptly.

6. Policy review

This Conflict Minerals Policy will be periodically reviewed and updated to reflect evolving regulatory requirements, international best practices, and changes in the Company's operations or supply chain. The review process ensures continued relevance, effectiveness, and alignment with Exide Industries' broader sustainability and risk management commitments.

7. Policy Oversight

The Executive Committee is the highest body responsible for reviewing and overseeing the implementation of the policy, supported by relevant cross-functional teams including procurement, legal, and compliance. These bodies are responsible for ensuring effective implementation, monitoring supplier adherence, and escalating critical issues to senior management, as necessary.

8. Glossary

CMRT: Conflict Minerals Reporting Template

EMRT: Extended Minerals Reporting Template

OECD: Organization for Economic Co-operation and Development

RMI: Responsible Minerals Initiative

3TG: Tin, Tungsten, Tantalum, and Gold

9. Contact Information

Procurement team

Email: Central.Procurement@exide.co.in

Version History

Version Number	Date of Enforcement
V1.0	18 September 2025