

Conflict Minerals Sourcing Policy

Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas

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Date: Dec 06,2024

Purpose

BC Instruments India is committed to responsible sourcing of minerals in line with international standards and guidelines, including the Responsible Minerals Initiative (RMI), the U.S. Dodd-Frank Act, the EU Regulation 2017/821, and relevant United Nations resolutions.

This policy ensures compliance with conflict minerals requirements, promotes ethical practices, and ensures transparency throughout our supply chain.

2.0 Scope

This policy applies to all materials and products sourced or manufactured under BC Instruments India's operations. It includes, but is not limited to, tin, tantalum, tungsten, and gold (3TG), as defined in relevant regulations and international due diligence guidelines.

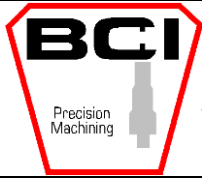
3.0 Policy Commitments

3.1 Serious Abuses Associated with the Extraction, Transport, or Trade of Minerals

BC Instruments India will neither tolerate nor profit from, contribute to, assist with, or facilitate the commission of:

- Forced or compulsory labour, including work performed under threat of penalty without voluntary consent.
- Child labour.
- Other human rights abuses and violations.
- War crimes, crimes against humanity, genocide, or other serious violations of international humanitarian law.
- The Company will immediately suspend or terminate relationships with suppliers if there is a reasonable risk they are linked to these serious abuses.

Prepared by:		Approved by:
MR		Sunil Dave (MD)



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3.2 Direct or Indirect Support to Non-State Armed Groups

- The Company will not tolerate direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals. Such support includes:
 - Illegally controlling mine sites or transportation routes.
 - Illegal taxation or extortion of money or minerals.
 - Providing logistical assistance or equipment to such groups.
- Relationships with suppliers linked to these activities will be suspended or terminated after due diligence.

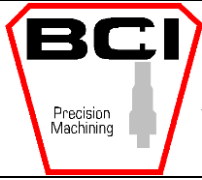
3.3 Public or Private Security Forces

- BC Instruments India will ensure that public or private security forces involved in mining activities operate solely to maintain the rule of law, safeguard human rights, and protect legitimate mining and trade operations.
- Direct or indirect support to security forces engaging in illegal activities such as taxation, extortion, or control of mine sites will not be tolerated.
- Legally mandated payments, taxes, or royalties to governments are exempt from this prohibition.
- The Company will take corrective actions or terminate relationships with suppliers found supporting such forces unlawfully.

3.4 Bribery and Fraudulent Misrepresentation of Mineral Origin

- The Company prohibits offering, promising, giving, or soliciting bribes to conceal or misrepresent the origin of minerals.
- Misrepresentation of taxes, fees, or royalties paid for mineral extraction, trade, or export is strictly prohibited.

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3.5 Money Laundering

- BC Instruments India is committed to preventing money laundering linked to the illegal extraction, trade, or handling of minerals. If reasonable risks of money laundering are identified, the Company will support corrective measures or terminate supplier relationships.

4.0 Procedures

4.1 Supplier Engagement and Communication

- Suppliers will be notified about laws and regulations related to conflict minerals, including this policy.
- Purchase orders will include language confirming compliance with conflict-free sourcing requirements and adherence to the Conflict Minerals Reporting Template (CMRT).

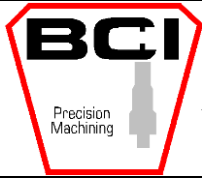
4.2 Due Diligence and Risk Mitigation

- The Company will perform due diligence in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Suppliers are required to source minerals only from validated smelters listed under the Responsible Minerals Assurance Process .
- Any observed violations will trigger corrective actions, including potential termination of supplier relationships.

4.3 Audits and Monitoring

- The Company reserves the right to audit suppliers if needed to ensure compliance with conflict minerals policies.
- Suppliers must provide full disclosure regarding the origin of minerals through the CMRT.

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4.4 Training and Capacity Building

- BC Instruments India will provide training to internal teams and suppliers to enhance awareness and understanding of conflict-free sourcing requirements.

4.5 Reporting Mechanisms

- Suppliers and employees are encouraged to report concerns related to non-compliance with this policy. Reports will be reviewed, and appropriate action will be taken.

5.0 Consequences of Non-Compliance

- Non-compliance with this policy may result in:
 - Immediate suspension or termination of supplier relationships.
 - Penalties or other actions proportionate to the severity of the violation.
- Suppliers will be informed of non-compliance findings and given an opportunity to address issues before termination.

6.0 Review and Updates

- This policy will be reviewed annually and updated as necessary to reflect changes in regulations, international guidelines, and industry best practices.

7.0 Commitment to Responsible Sourcing

BC Instruments India reaffirms its dedication to sourcing minerals responsibly, respecting human rights, and contributing to sustainable development in conflict-affected and high-risk areas.

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