



CONFLICT MINERAL POLICY

Kirloskar Brothers Limited (KBL) supports the effort of eradication of Human Rights abuses in the Democratic Republic of Congo (DRC) & adjoining countries and pledges to ensure that minerals used in our products are not sourced from conflict zones. This policy aims to comply with the U.S. Securities and Exchange Commission's (SEC) annual disclosure requirements for companies that use minerals or mineral derivatives defined as 'conflict minerals' under Section 1502 of the Dodd-Frank Wall Street Reform & Consumer Protection Act and the SEC's rule (Rule 13p-1 under the Securities Exchange Act).

"Conflict Minerals" are defined as cassiterite (for tin), wolframite (for tungsten), coltan (for tantalum) and gold ore (called as 3TGs) or their derivatives. These have been linked with the funding of human rights abuse in the conflict zones. The 'conflict zones' include Democratic Republic of Congo, Central African Republic, Sudan, Zambia, Angola, Congo Republic, Tanzania, Burundi, Rwanda, and Uganda (Covered countries).

KBL's commitment towards conflict mineral policy;

- We shall work with our external providers of processes, products and services and customers from our product supply chain to exclude the use of conflict minerals sourced from conflict zones.
- We shall implement due diligence to identify and monitor the use of conflict minerals in our products and supply chain.
- We shall ensure that the products and raw material we consume do not contain conflict materials which are sourced from conflict mines located in covered countries.
- We commit to educate our employees and suppliers so as to have clear visibility in regard to the origin of the minerals and not sourcing Conflict Minerals from Covered Countries that are not deemed "conflict free" knowingly.

Our organisation aims to ensure that only conflict-free minerals are used in its product portfolio. For this, we constantly monitor our supply chain to ensure transparency by incorporating and implementing following procedures;

- Communicate and guide suppliers on conflict minerals compliance requirements.
- Incorporate the conflict minerals in our sourcing protocol.
- Ensure compliance through keeping it a part of Purchase Order.
- Review compliance process for adequacy and update as needed.

Issue Number : 01
Review Date : 24th June, 2021
Next Review Date: 23rd June, 2022

Sanjay C. Kirloskar
Chairman & Managing Director