

Chairman’s Office Europe and North Africa

POLICIES & PROCEDURES

POLICY NAME	CONFLICT MINERALS POLICY				
EFFECTIVE DATE	February 16, 2024	DATE OF LAST REVISION	February 16, 2024	VERSION NO.	1
ISSUED BY [Policy Owner]	Head of the Chairman’s Office Europe and North Africa, Legal Affairs COE				
POLICY ADMINISTRATOR	Policies <policies.coe@motherSON.com>			DOCUMENT ID	FY24-LEG-02
APPLIES TO					
REGION (RCO)	COE	BUSINESS DIVISION	All	COUNTRY WITHIN RCO	All
POLICY KEY OBJECTIVE	MotherSON is committed to conducting its business operations in an ethical and socially responsible manner. As part of this commitment, we recognize the importance of addressing the issue of conflict minerals within our supply chain. This policy outlines our stance on conflict minerals and establishes the framework for responsible mineral sourcing practices in addition to the MotherSON Supplier Code of Conduct.				
CONFIDENTIALITY LEVEL	<input type="checkbox"/> Confidential <input type="checkbox"/> Internal <input checked="" type="checkbox"/> Public	This document is for PUBLIC USE and can be made available for all employees and other stakeholders.			


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PURPOSE AND BACKGROUND

MotherSON is committed to conducting its business operations in an ethical and socially responsible manner. As part of this commitment, we recognize the importance of addressing the issue of conflict minerals within our supply chain. This policy outlines our stance on conflict minerals and establishes the framework for responsible mineral sourcing practices in addition to the MotherSON Supplier Code of Conduct.

APPLICABILITY AND SCOPE

This policy applies to all MotherSON operations and extends to our suppliers, contractors, and business partners in the automotive industry in the Chairman’s Office Europe and North Africa (COE) region.

ABBREVIATIONS AND DEFINITIONS

COE	Chairman’s Office Europe and North Africa
Conflict Minerals	Refer to gold, 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 may designate other minerals in the future
CMRT	Conflict minerals reporting template
IMDS	International Material Data System


CONFLICT OF MINERALS DISCLOSURE

The U.S. Securities and Exchange Commission (SEC) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) requires publicly traded companies subject to Securities Exchange Act of 1934 reporting requirements, to report annually on the use and source of ‘conflict minerals’ in their products.

By requiring companies using conflict minerals in their products to disclose the source of such minerals, the law is aimed at dissuading companies from continuing to engage in trade that supports regional conflicts.

Conflict minerals refer to tantalum, tin, tungsten, and gold (3TG) sourced from regions known to contribute to human rights abuses, environmental degradation, and conflict financing, particularly in the Democratic Republic of Congo (DRC) and adjoining countries.

Under legislation which came into effect in 2012, manufacturers who file certain reports with the U.S. Securities and Exchange Commission (SEC) must disclose whether products they manufacture, or contract to manufacture, contain conflict minerals that come from sources that support or fund inhumane treatment and partially financing violent conflicts in the region of the Democratic Republic of the Congo or an adjoining country.

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COMMITMENT

MotherSON is committed to:

- comply with the OECD Due Diligence Guidance 5 step framework to identify and assess the presence of conflict minerals within our supply chain.
- engaging with suppliers to ensure transparency and responsible sourcing practices.
- avoiding the use of conflict minerals that directly or indirectly contribute to human rights violations, environmental damage, or conflict financing.
- supporting responsible mineral sourcing initiatives that promote ethical practices in the supply chain.
- respect of human rights and ethical and lawful conduct in their mineral sourcing practices.

EXPECTATION TO SUPPLIERS

MotherSON is committed to sourcing components and materials from companies that share our values and commitment to human rights, ethics, and environmental responsibility.

We require our direct suppliers to:


- implement due diligence measures to source only from certified conflict-free smelters, such as those audited by the Responsible Mineral Initiative's
- assess and manage the risk of using conflict minerals and annually provide information on the origin of minerals in their products by using CMRT.
- comply with international guidelines and industry standards related to responsible mineral sourcing.
- Adopt policies and procedures with respect to 3TG consistent with this Policy and the OECD Guidance.
- Commit to this policy by accepting MotherSON Supplier Code of Conduct

REPORTING AND TRANSPARENCY

- Provide annual reports on the progress of conflict minerals due diligence efforts.
- Encourage transparency and cooperation within the industry to collectively address the issue of conflict minerals.

COMPLIANCE

Failure to comply with this policy may result in appropriate actions, including but not limited to, discontinuation of business relationships with non-compliant suppliers. Suppliers who do not comply with these expectations will be reviewed and evaluated accordingly for future business and sourcing decisions.

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REVIEW AND APPROVAL

This Conflict Minerals Policy has been approved by the COE Head and will be reviewed periodically to ensure its continued effectiveness and relevance.

CLARIFICATION AND EXCEPTIONS

Clarifications with regard to this policy can be obtained from the Legal Affairs COE team at legal.coe@motherSON.com. Any deviation from the procedures herein outlined must be reported to the Legal Affairs COE team and to the COE Head.

DOCUMENT VERSION HISTORY

VERSION HISTORY		
VERSION	REVISION DATE	DESCRIPTION OF CHANGE
v.1	February 16, 2024	Original document published