

	Responsible Sourcing of Materials- Raw Materials & BOP Policy	Document No.	MECPL/Policy/PUR
		Rev. No.	00
		Rev. Date	01/12/2024

This policy shall be called MECPL Responsible Sourcing of Raw Materials Policy. MECPL reserves the right to cancel or amend all or any part of this policy and issue supplementary rules at any stage.

1. Overview

The Responsible Sourcing of Raw Materials Policy underscores MECPL’s commitment to ethical, sustainable, and compliant procurement practices in aluminum alloying and die-casting. Recognizing the environmental, social, and governance (ESG) challenges associated with raw material sourcing, this policy aligns with global frameworks, including the OECD Guidelines, the UN Global Compact (UNGC), and various regulatory requirements such as RoHS, REACH, and the Conflict Minerals Regulations.

2. Purpose

The purpose of this policy is to:

- Ensure that raw materials are sourced responsibly, minimizing environmental and social risks.
- Prohibit the use of materials linked to unethical practices, including Conflict Minerals (3TG).
- Comply with international standards and regulations, including RoHS, REACH, and the Stockholm Convention on Persistent Organic Pollutants (POP).
- Promote sustainability, health, and safety throughout our supply chain.

3. Scope

This policy applies to:

- All raw material procurement for aluminium alloying and die-casting operations.
- All employees, contractors, and suppliers involved in the sourcing, handling, and use of raw materials.
- All stakeholders, including customers, regulators, and community members impacted by our operations.

4. Policy Statement

Ethical Sourcing and Compliance

1. Raw materials must be sourced in compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
2. Suppliers must adhere to the UNGC principles on human rights, labour, environment, and anti-corruption.
3. Avoid sourcing materials containing 3TG (tantalum, tin, tungsten, and gold) from conflict zones unless verified as conflict-free.

Prohibition or Restriction of Specific Materials

1. Prohibit or restrict substances of concern (SOC), Substances of High Concern (SHC), and Persistent Organic Pollutants (POP) in line with RoHS, REACH, and other applicable standards.
2. Implement robust tracking and reporting mechanisms to ensure compliance with these restrictions.

Health, Safety, and Environment

1. Ensure materials meet health and safety standards to minimize risks to employees and communities.
2. Adopt environmentally responsible practices to reduce waste, emissions, and environmental degradation during sourcing and processing.

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3. Encourage suppliers to implement sustainable practices and minimize their environmental footprint.

Supplier Accountability

1. Conduct regular assessments of suppliers to ensure adherence to this policy.
2. Terminate relationships with suppliers that fail to meet compliance and ethical standards.

5. Policy Compliance

a. Compliance Measurement

Documentation and reporting on sourcing practices.

b. Exception

Exceptions to this policy must be approved by top management and documented with a clear rationale.

c. Non-Compliance

- Corrective actions and engagement with suppliers to address issues.
- Suspension or termination of contracts for severe or repeated violations.
- Reporting violations to relevant authorities if required by law.

6. Related standards, Policies and Processes

- MECPL IMS Policy
- MECPL Code of Conduct & Ethic Policy
- OECD Due Diligence Guidance for Responsible Supply Chains
- UN Global Compact Principles
- EU REACH Regulation (EC 1907/2006)
- EU RoHS Directive (2011/65/EU)
- Conflict Minerals Regulation (EU 2017/821)
- Stockholm Convention on Persistent Organic Pollutants
- ISO 45001: Occupational Health and Safety Management
- ISO 14001: Environmental Management System

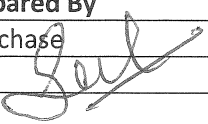
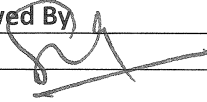
7. Definitions & Terms

1. **Maxop Engineering Co. Pvt. Ltd. (herein called "MECPL")**
2. **Substances of Concern (SOC):** Materials that pose risks to human health or the environment.
3. **Substances of High Concern (SHC):** Chemicals identified under REACH that require authorization before use.
4. **Persistent Organic Pollutants (POP):** Toxic chemicals that persist in the environment, as defined under the Stockholm Convention.
5. **REACH:** A European Union regulation for Registration, Evaluation, Authorization, and Restriction of Chemicals.
6. **RoHS:** Restriction of Hazardous Substances, an EU directive limiting the use of specific hazardous materials in electronics and electrical equipment.

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8. Revision History

Policy Amendment History			
Sl. No.	Amendment No.	Amendment Date	Amendment Details
1.	00	01.12.2024	Initial Release

Prepared By	Reviewed By	Approved By
Purchase 	ESG 	VP-Alloy 