



Name of the Document		Conflict Mineral Policy
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State whether Policy/ Code/Manual / Guidelines		Policy
Group Level / Sector level (Specify which sector)		Mahindra and Mahindra Ltd.
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00	M&M Sustainability and Strategic Sourcing Unit	NA

Background

It is observed that some of the valuable natural resources such as tin, tungsten, tantalum and gold (3TG) extracted from the Democratic Republic of Congo or its surrounding countries by appalling activities like massacre and abduction of civilians by armed forces, looting and enrolling of child soldiers. Revenue generated from selling of these natural resources used to perpetuate the fights. Procuring of such minerals from these distressed regions is equivalent to funding for these inhumane activities.

Mahindra & Mahindra Ltd. owns responsibility of materials with full deliberation and take care to avoid the procurement or usage of such Mineral in our products and services.

The term “conflict minerals” is defined as columbite-tantalite, also known as coltan (from which tantalum is derived); cassiterite (tin); gold; wolframite (tungsten); or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

Objective

Objective of the conflict mineral policy are

- Avoid the procurement or usage of such minerals which are unlawful or which are obtained through unethical or otherwise unacceptable means
- The company never allows any violation of human rights conducted in any part of the world for sourcing any raw materials for the manufacturing of our products
- Make sure that minerals used in our products are responsibly sourced following standards set by the Organisation for Economic Co-operation and Development and other internationally recognized human rights instruments.
- Deploy responsible procurement practises to our entire supply chain including different tiers
- It is also expected for Suppliers will have their due-diligence within their own supply chain



Policy: M&M Shall

- Not source or use any Conflict Minerals (3TG) from DRC or its surrounding countries.
- Ensure and review compliance to conflict mineral policy

Policy Adherence Responsibility

- Adherence to policy is responsibility of every person under purchasing domain.

General

- If any Supplier or Employee comes across a case of infringement of these guidelines he/she should bring it the notice of business heads/ CEO /Sr VP / VP./ Procurement head in writing and respective shall take immediate and corrective measures.
Communications can be send on email ID : msetuhelpdesk@mahindra.com
- business heads/ CEO /Sr VP / VP./ Procurement head shall ensure due confidentiality to such incidents

Mr Nitin Tikle

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