

CONFLICT OF MINERAL POLICY STATEMENT

Policy No : SWIL:HR/17/ Page : 1-OF 2 Effective Date : 25.04.2017

Amendment :

Star Wire India Limited recognizes that we have responsibility to respect human rights and conduct reasonable checks in our process and supply chain to avoid sourcing directly / indirectly from conflict region. Star wire India Limited takes serious note of violent conflict in the Democratic Republic of Congo (DRC) region which is partially financed by the exploitation and trade of conflict minerals-Tantalum, Tin, Tungsten and gold originating in the DRC region

'Conflict Minerals' refers to minerals or other derivatives (specifically, Tin, Tantalum, Tungsten, and Gold, also known as 3TG) mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and in the adjoining countries where child labour is used and the revenues of the 3TG minerals may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. In Aug 2012, The United States Security and Exchange Commission ("SEC") issued the final Dodd-Frank Financial Reform & Consumer Protection Act, section 1502(b) requiring all US public companies and their suppliers to disclose the chain of custody usage of conflict minerals

While "Star Wire (India) Limited" is not subject to SEC reporting, "Star Wire (India) Limited" fully supports this legislation and its position is to avoid the use of conflict minerals.

In order to comply with the applicable SEC rules and, just as importantly, to adhere to our company values takes following measures to ensure the products and parts do not contain Conflict Minerals, sourced from mines that support conflict within the DRC and adjoining countries.

Approach:

Identify the parts having Conflict minerals- Tantalum, Tin, Tungsten and Gold (3TGs) in our Products and processes.

- Not to buy conflict minerals directly from Conflict Mines.
- Guide Suppliers and supply chain about Conflict Minerals to ensure compliance.
- Update our customers to comply with disclosure obligations.

Star Wire India Limited defines following steps to implement and sustain the compliance:

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

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CONFLICT MINERAL POLICY IMPLEMENTATION PROCEDURE

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