

Date: 29th Jan, 2025

CONFLICT MINERALS POLICY

Purpose

United Gears is committed to responsible sourcing and ensuring that our products do not contribute to human rights abuses, environmental damage, or unethical practices. This policy outlines our commitment to sourcing minerals responsibly, in accordance with applicable regulations and global best practices.

Scope

This policy applies to all employees, suppliers, and business partners involved in the procurement, manufacturing, or distribution of products that may contain tin, tungsten, tantalum, or gold (collectively known as "3TG minerals").

Policy Statement

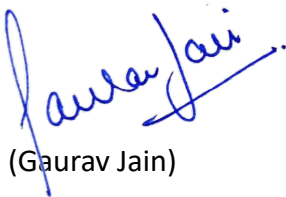
- Compliance with Regulations:** United Gears adheres to all applicable laws and regulations, including but not limited to Section 1502 of the U.S. Dodd-Frank Act and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Responsible Sourcing:** We require our suppliers to source 3TG minerals only from smelters and refiners that are certified as conflict-free by recognized industry standards such as the Responsible Minerals Initiative (RMI).
- Supplier Expectations:** We expect our suppliers to:
 - Conduct due diligence on the origin and chain of custody of 3TG minerals.
 - Provide accurate and transparent reporting on the sourcing of these minerals.

- Support efforts to improve traceability and ethical sourcing practices in the supply chain.
- 4. **Risk Mitigation:** If we identify that materials from high-risk areas are being used in our supply chain, we will work with suppliers to transition to conflict-free sources or take appropriate corrective actions, including reevaluating business relationships.
- 5. **Transparency & Reporting:** United Gears is committed to transparency and will disclose our efforts related to conflict minerals sourcing in accordance with regulatory requirements and customer expectations.
- 6. **Continuous Improvement:** We will regularly review and update our policies and procedures to align with evolving industry standards and best practices. This policy shall be reviewed in 2 years.

Implementation & Accountability

- The responsibility for implementing and maintaining this policy lies with the Supply Chain and Compliance teams.
- Any concerns related to conflict minerals can be reported confidentially through our established grievance mechanisms.

By adhering to this policy, United Gears and its partners contribute to ethical and responsible business practices that respect human rights and promote sustainable sourcing.



(Gaurav Jain)

Authorized Signatory