

Date: 30th Jan, 2025

MATERIAL PROCUREMENT POLICY – XUAR (XINJIANG PROVINCE, CHINA)

Purpose

United Gears is committed to responsible sourcing and ethical business practices. This policy outlines our stance on material procurement from China's Xinjiang Uyghur Autonomous Region (XUAR) to ensure compliance with international regulations and human rights standards.

Scope

This policy applies to all employees, suppliers, and business partners involved in the procurement of raw materials, components, or finished goods that may originate from XUAR, directly or indirectly.

Policy Statement

- Compliance with Regulations:** United Gears strictly adheres to all applicable laws and regulations, including but not limited to the U.S. Uyghur Forced Labor Prevention Act (UFLPA), European Union regulations, and other relevant trade policies.
- Prohibition of Forced Labour:** We do not procure or use materials, products, or services sourced from XUAR that may be linked to forced labor or human rights violations. Any supplier found to be sourcing from this region without proper due diligence and verification will be subject to corrective actions, including termination of the business relationship.
- Supplier Due Diligence:** We require our suppliers to:
 - Certify that they do not source materials from XUAR unless they can provide verifiable evidence that such sourcing is free of forced labour.
 - Provide full transparency and documentation regarding the origin of raw materials.

4. **Risk Assessment & Mitigation:** United Gears will:

- Conduct periodic audits and supplier assessments to verify compliance with this policy.
- Engage with independent third-party verifiers when necessary to ensure ethical sourcing practices.
- Take appropriate corrective measures if non-compliance is identified, including immediate suspension of procurement from high-risk sources.

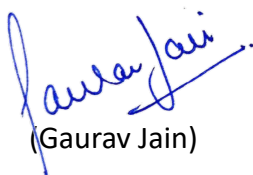
5. **Transparency & Reporting:** United Gears commits to maintaining transparency regarding its sourcing practices and will disclose relevant actions taken to mitigate risks associated with XUAR sourcing in accordance with regulatory requirements.

6. **Continuous Improvement:** This policy will be reviewed regularly to align with evolving legal requirements, industry standards, and best practices in ethical sourcing. This policy shall be reviewed in 2 years.

Implementation & Accountability

- The Supply Chain and Compliance teams are responsible for implementing and maintaining this policy.
- Any concerns related to material procurement from XUAR 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