



**RESPONSIBLE SOURCING POLICY**

**Kutch Copper Limited**

## I. Introduction

As a global metals business, we recognize the substantial risks of adverse impacts associated with the extraction, processing, handling, and exportation of minerals from Conflict-Affected and High-Risk Areas (CAHRAs). We further acknowledge the significant role our business can play in promoting and upholding responsible business practices, both within our organization and throughout our supply chains.

## II. Policy Commitment

In adopting this Responsible Supply Chain Policy, we hereby affirm our commitment to the following principles:

1. **Respect for Human Rights:** We are committed to respecting and promoting human rights in all aspects of our operations.
2. **Conflict Financing Prohibition:** We will refrain from engaging in any conduct that may contribute to the financing of conflict.
3. **Compliance with Sanctions:** We will comply with all applicable United Nations sanctions, resolutions and relevant domestic legislation implementing such resolutions.
4. **Prohibition of Serious Abuses:** We shall neither tolerate nor derive any benefit from, contribute to, assist with, or facilitate the commission of serious abuses associated with the extraction, transportation, or processing of minerals, including but not limited to:
  - a. Any forms of torture or cruel, inhuman, or degrading treatment
  - b. Any forms of forced or compulsory labour
  - c. The worst forms of child labour
  - d. War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.
5. **Non-State Armed Groups:** We shall not provide direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals, particularly those groups that:
  - a. Illegally control mining sites or transportation routes or influence upstream actors in the supply chain;
  - b. Illegally tax or extort money or minerals at access points to mining sites, along transportation routes, or at trading locations.
  - c. Illegally tax or extort intermediaries, export companies, or international traders.
6. **Bribery and Corruption:** We will not offer, promise, give, or demand bribes; will resist solicitation of bribes; and will actively support initiatives aimed at the effective elimination of money laundering.

7. **Tax Compliance:** We shall ensure that all taxes, fees, and royalties associated with mineral extraction, trade, and export from CAHRAs are paid to the appropriate governmental authorities.
8. **Environmental Stewardship:** We shall commit to minimizing environmental impact and promoting sustainable practices throughout our operations and supply chains, including compliance with relevant environmental regulations and standards.
9. **Supply Chain Transparency:** We shall promote transparency by maintaining accurate records and providing accessible information regarding our sourcing practices in overall supply chain
10. **Supplier Engagement:** We shall engage with suppliers to ensure their understanding and adherence to this Responsible Supply Chain Policy and abide by our supplier code of conduct
11. **Training and Awareness:** We shall provide training and resources to employees and suppliers on responsible sourcing practices, human rights, and ethical conduct to promote awareness and compliance.
12. **Continuous Improvement:** We shall regularly review and enhance policies and practices related to responsible sourcing, incorporating stakeholder feedback and developments in international standards.

### III. Due Diligence Framework

To uphold these commitments, we will implement a due diligence framework aligned with the 5 step framework of Organization for Economic Cooperation & Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, comprising the following five steps:

1. **Management System:** Establishing a robust corporate management system.
2. **Risk Identification and Assessment:** Identifying and assessing risks throughout the supply chain.
3. **Risk Mitigation Strategy:** Developing and executing strategies to address identified risks.
4. **Third-Party Audits:** Conducting independent third-party audits of supply chain due diligence at designated points within the supply chain.
5. **Reporting:** Reporting on supply chain due diligence activities in accordance with our internal Standard Operating Procedures.

### IV. Stakeholder Engagement

We leverage our influence within the supply chain to facilitate positive change. Accordingly, we will strive to/for:

1. **Collaborative Engagement:** Engage with suppliers, governmental authorities, international organizations, civil society, and affected stakeholders to develop and implement effective risk management plans aimed at enhancing performance through measurable actions undertaken within reasonable timeframes, including capacity-building initiatives via training and dialogue.

2. **Security Forces Engagement:** In instances where we or any entity within our supply chain engage public or private security forces:
  - a. We shall ensure such engagements comply with the Voluntary Principles on Security and Human Rights
  - b. We will support efforts to enhance transparency, proportionality, and accountability regarding payments made to public security forces;
  - c. We will advocate for measures to mitigate adverse impacts on vulnerable groups arising from the presence of security forces on mining sites.
3. **Community Involvement:** Actively involve local communities in the decision-making processes that affect them, ensuring their voices are heard and their concerns are addressed in our operations and supply chain activities.
4. **Feedback Mechanisms:** Establish and maintain accessible feedback mechanisms for stakeholders to express their concerns or suggestions related to our sourcing practices, ensuring that all feedback is considered and addressed appropriately.
5. **Multi-Stakeholder Initiatives:** Participate in and support multi-stakeholder initiatives that promote responsible sourcing and address human rights and environmental issues in the supply chain, fostering collaboration among industry peers.
6. **Transparent Communication:** Maintain open lines of communication with all stakeholders, providing timely and relevant information regarding our sourcing practices, risk assessments, and the measures we are implementing to mitigate potential adverse impacts.
7. **Monitoring and Evaluation:** Implement monitoring and evaluation processes to assess the effectiveness of our stakeholder engagement efforts, ensuring that our strategies are responsive to the evolving needs and concerns of all parties involved.
8. **Long-Term Partnerships:** Foster long-term partnerships with stakeholders that are built on mutual respect, trust, and shared goals, recognizing that collaborative efforts are essential for achieving sustainable outcomes.
9. **Support for Local Economies:** Encourage local sourcing and support local businesses as part of our commitment to economic development, helping to strengthen community resilience and sustainability.

## V. Risk Management Protocols

In alignment with our engagement strategy, we will implement the following risk management protocols as necessary:

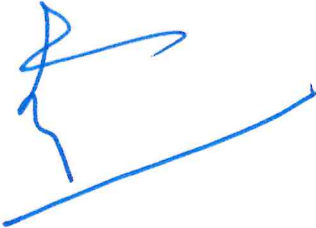
1. **Suspension of Engagement:** Upon identifying a reasonable risk of serious abuses associated with mineral extraction, transport, or trade, we shall promptly suspend or terminate our engagement with suppliers linked to such abuses.

2. **Non-State Armed Groups:** In cases where there is a reasonable risk of direct or indirect support to non-state armed groups, we will immediately suspend or discontinue our engagement with suppliers associated with such activities.
3. **Risk Mitigation:** Regarding public or private security forces, and risks related to bribery, fraudulent misrepresentation of mineral origins, money laundering, and non-payment of taxes, fees, and royalties, we will suspend or terminate our engagement with suppliers following unsuccessful attempts at mitigation within a reasonable timeframe.

Any comments, questions, or grievances related to the topics covered in this Policy may be addressed via KCL's grievance mechanism:

Name	Email ID	Web Portal
Mr. Seetharaman Narasuraman	<a href="mailto:seetharaman.narasuraman@adani.com">seetharaman.narasuraman@adani.com</a>	www.adanimetals.com

This Policy shall be communicated to all suppliers and other stakeholders, as appropriate, and be made publicly available on our website.



**Dr. Vinay Prakash**  
Managing Director  
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