



THERMO CABLES LIMITED

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Rev: 00

CONFLICT MINERALS POLICY

THERMO CABLES LIMITED strives to be a good corporate citizen. We are committed to ensuring the health, safety and protection of people who come into contact with our products and business. We require high social, environmental and human rights standards among our suppliers. Managing our obligations in relation to Conflict Minerals (3TG) and Extended Minerals (Mica and Cobalt) is a part of this corporate responsibility.

THERMO CABLES LIMITED is committed to:

- Identifying which THERMO CABLES LIMITED products are impacted and targeting our efforts accordingly.
- Not buying products and materials containing conflict minerals directly from conflict mines and extended minerals from Conflict-Affected and High-Risk Areas.
- Working with our suppliers to ensure that any conflict minerals contained in the products and materials supplied to THERMO CABLES LIMITED originate from conflict free sources.
- Contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of conflict minerals.

In addition, we are committed to engaging with our customers regarding their disclosure obligations.

Background

In August 2012, the United States Securities and Exchange Commission (SEC) issued its final rules regarding Conflict Minerals (known as '3TG' – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Act). As a result, many companies are now focusing on whether and to what extent their products contain Conflict Minerals and whether such Conflict Minerals come from the Democratic Republic of Congo and the adjoining countries named in the Act.



Measures

In working towards these commitments, we have taken a number of steps that include:

- Establishing a “Conflict Minerals Compliance Program” to review the use of conflict and extended minerals in our products and to be in a position to fulfil our reporting obligations respond to customer inquiries.
- Requiring our suppliers to implement a policy regarding conflict and extended minerals. In addition, exercise due diligence to investigate the source of these minerals.
- Engaging with our suppliers so that they respond in a timely manner to our requests for evidence of compliance. In the future, our supplier’s willingness to comply with this initiative will be a factor in our sourcing decisions.
- Updating the THERMO CABLES LIMITED supplier code of conduct and our purchasing terms and conditions to reflect this policy.



Authorized Signatory
Thermo Cables Limited,
Hyderabad.