



1<sup>st</sup> April 2025

## **TITAN COMPANY LIMITED**

### **JEWELLERY DIVISION PRECIOUS METALS SUPPLY CHAIN POLICY**

**Titan Company Limited** (the “Company”) is committed to responsible sourcing across the supply chain of its Jewellery Division. This Jewellery Division **Precious Metals Supply Chain Policy** (the “Policy”) applies only to the Jewellery Division of Titan Company Limited and reaffirms its commitment to respecting human rights, avoiding any contribution to the financing of conflict, and complying with all applicable laws and regulations.

#### **Responsible Sourcing**

The Company is committed to:

- Respecting human rights according.
- Not engaging in bribery, corruption, money laundering or financing terrorism.
- Supporting transparency in payments to governments and encourage human rights standards in security arrangements in extractives industry.
- Not providing direct or indirect support to illegal armed groups.
- Enabling Stakeholder engagement and grievance redressal.
- Ensuring no involvement in, or facilitation of:
  - Torture or inhuman treatment
  - Forced or child labour
  - War crimes, crimes against humanity, or genocide.

#### **Conflict Minerals Policy Statement (Precious Metals)**

- The Company is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, the Company seeks to source precious metals from suppliers that share its values around human rights, ethics and environmental responsibility.
- The Company will strive to ensure that the precious metals it sources does not originate from Conflict-Affected and High-Risk Areas (CAHRA). Where feasible, the Company will source only from London Bullion Market Association (“LBMA”)/Dubai Good Delivery (“DGD”) accredited refineries or suppliers.

Reference is made to The Organization for Economic Co-operation and Development (OECD). OECD is an international organization that *inter alia* provides guidance in combating terror funding and conflicts in regions affected by poor governance, political instability and war.

### **Grievances and Complaints**

The Company has established an internal committee ("Committee") to address concerns, complaints, and grievances submitted by employees, customers, suppliers and other affected end-users pertaining to the sourcing of precious metals ("Stakeholders"). A grievance may include a written objection related to business operations or decisions that impact any of the aforementioned parties. Such submissions aim to address perceived injustices or wrongdoings that the complainant believes they have witnessed or experienced. We encourage anyone aggrieved to submit reports along with proof in the form of documents and provide as much information as possible for the investigation. Reports may be submitted to the following email address: [sampathd@titan.co.in](mailto:sampathd@titan.co.in)

### **Confidentiality**

The Committee will maintain the confidentiality of the individuals raising a concern. All documents, files, and information accessed or obtained during the process will be used for investigating alleged non-compliance of this Policy.

### **Submission of Grievance**

- Responsible Party: Complainant (Stakeholder)
- Method: Submission via email to [sampathd@titan.co.in](mailto:sampathd@titan.co.in)
- The grievance should contain full details of the issue and supporting documents and evidence must be submitted.

### **Grievance Redressal Process**

- **Acknowledgement of Receipt:** Written acknowledgment of grievance shall be provided in 3 business days.
- **Preliminary Review and Risk Assessment:** The Committee will-
  - Assess completeness of submission.
  - Evaluate urgency and severity.
  - Determine if the issue falls within its ambit for resolution.
  - Timeline: The Committee will complete its preliminary review within 7 working days from acknowledgment and shall process further for investigation.
- **Initiation of Investigation**
  - Responsible Party: Assigned Investigators
  - Action: Conduct internal investigation and request clarifications or additional documents (if needed)
- **Interview relevant parties (when applicable)**
  - Timeline: Investigation will be initiated within 10 working days from the completion of preliminary review.
  - Duration: Investigation will be completed within 20 working days, unless extended due to complexity.
- **Escalation (if necessary)**

If the issue cannot be resolved at the initial investigation, , then it will be escalated to Sowmya Chandrasekar ([sowmyachandrasekar@titan.co.in](mailto:sowmyachandrasekar@titan.co.in)).

- **Issuing Final Decision and Corrective Actions**

- Responsible Party: Committee

- Action:

- Notify and Issue a reasoned written decision to the Complainant (unless anonymous)
    - Recommend corrective or disciplinary actions
    - Update internal risk management systems
    - Timeline: Within 10 working days from conclusion of investigation

- **Recordkeeping and Reporting**

- Responsible Party: Bullion Team


- Action:

- Securely store grievance records
    - Report summary of grievances and actions to senior management quarterly
    - Include anonymized data in annual compliance reports
    - Identify additional control measures if needed revise the policy and procedures and communicate to concerned heads.

### **Review and Amendment**

The Company reserves the right to review and amend this Policy at its discretion, as and when deemed appropriate

**For Titan Company Limited**



**Authorized Signatory**