

## Guideline on Procurement of Conflict Minerals

### General

This guideline provides an outline of our policy for the sourcing of materials that contain or are manufactured from minerals sourced from conflict affected and high risk areas in line with our corporate policy, legal obligations and existing international standards.

For the purpose of this guideline on conflict minerals are those associated with tantalum, tin, gold and tungsten.

### Commitment to Sourcing Items Associated with Conflict Minerals

Our Company, Gujarat Fluorochemicals Limited, is committed to ensure that conflict minerals contained in our products are sourced with due respect for human rights, the need to avoid contributing to conflict, and the desire to support development through our supply chain practices.

At the same time, our Company does not ban the use of conflict minerals that originate in conflict affected and high-risk areas when they are sourced in accordance with existing international standards. Avoiding the sourcing of all conflict minerals from these areas would cause a de facto embargo with serious adverse impact on the living conditions of local populations.

### Working with Our Suppliers

We require that our suppliers ensure the products and materials supplied to our Company which are associated with conflict minerals are sourced in accordance with our policy as given above.

We shall incorporate into our purchasing procedures and documents conditions requiring suppliers to adopt a policy on the responsible sourcing of conflict minerals and to periodically provide to us information we need to support our obligations and policy. An overview of these procedures is provided on the following page.

Tel.: (02641) 618031 (Administration)  
618041-50 (Purchase)  
618086-87 (Security)  
Fax : (02641) 618012 (Purchase)



**GUJARAT  
FLUORO-CHEMICALS  
LIMITED**  
DAHEJ COMPLEX



12/A, GIDC Dahej Industrial Estate, Taluka : Vagra, Dist. Bharuch - 392 130, Gujarat. India.

### Purchase Orders

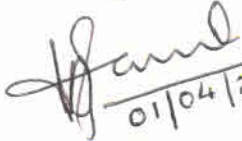
All purchase orders shall include the following statement:

All items supplied against this purchase order that contain Tin, Tantalum, Tungsten or Gold must be sourced in accordance with the OECD guidelines on conflict free mineral supply chains.

### Supplier Review

A register of major suppliers of items potentially containing conflict minerals shall be maintained. The compliance of each supplier in the register with the Company's conflict minerals policy shall be reviewed at least once per year, normally in the second quarter. The result of the review shall be recorded in the register of conflict minerals suppliers.

Where inadequate evidence of compliance with the Company's conflict minerals policy is found the continued use of the supplier shall be subject to the approval of a Company Director. Approval shall only be granted where reasonable alternative sources of supply are not available.

  
01/04/2019

Authorized Signatory