

Sustainable Procurement Policy

TRL Krosaki Refractories Limited (“TRLK”) recognizes that a sustainable and responsible supply chain is essential for business resilience, ethical conduct and long-term value creation. This Sustainable Procurement Policy sets out our commitment to responsible sourcing, supplier partnership and continuous improvement across our supply base, in alignment with the UN Global Compact Principles, applicable labor and environmental laws, and recognized global sustainability frameworks. This Policy is endorsed by the senior management of TRLK and is aligned with ISO 20400:2017 Sustainable Procurement, the UN Global Compact Ten Principles, the OECD Due Diligence Guidance for Responsible Business Conduct, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the UN Guiding Principles on Business and Human Rights, and the UN Sustainable Development Goals.

Scope

This policy applies to all TRLK employees and operations under TRLK’s operational control. It also applies to contractors working at TRLK sites and to suppliers/service providers to the extent defined in TRLK’s supplier requirements, contracts and procurement processes.

Our Commitments

- Environment: Minimize impacts on environment, manage water & energy, reduce emissions & waste.
- Health & Safety: Ensure safe workplaces, prevent accident and be ready for emergency situations.
- Sustainable Procurement: TRLK will implement ISO 20400:2017 in all procurement activities by end of 2026.
- GHG Emission: Implement effective initiatives to reduce greenhouse gas (GHG) emissions within its own operations and to collaborate and support its suppliers in achieving measurable reductions in GHG emissions throughout the value chain.
- Circular Economy: Suppliers need to implement and support in recycling and reuse of materials across all value chains.
- TRLK is committed to develop local suppliers and reduce dependency on imported materials.
- TRLK shall optimize upstream and downstream transportation activities and prioritize the adoption of less emission-intensive modes of transportation to minimize environmental impact.
- Fair Business: Prohibit bribery, corruption, fraud, money-laundering, anti-competitive behaviour and unauthorized representation.

- Human Rights & Labour: Prevent harassment, ensure safe, inclusive, non-discriminatory workplaces, pay legal or higher wages, respect freedom of association and collective bargaining and comply with working-hour laws.
- Communities: Support positive local social and economic outcomes.
- TRLK will confirm applicability of tin, tantalum, tungsten and gold (3TG) in its products and supply chain. Where applicable, TRLK will collect suppliers declarations, conduct risk-based due diligence aligned to OECD guidance and take corrective actions where risks are identified.
- TRLK will identify and prioritise critical suppliers based on spend, risk and business criticality, assess ESG risks for these suppliers, and implement mitigation and corrective action plans with defined timelines and follow-up.
- Modern Slavery & Forced Labour: Ensure all suppliers and contractors actively prohibit modern slavery, human trafficking, bonded and child labour and to adopt responsible recruitment practices including no recruitment fees being charged to workers.
- Supplier Code of Conduct: Ensure all suppliers to acknowledge and comply with TRLK's Supplier Code of Conduct as a precondition of doing business and reserve the right to suspend or terminate suppliers who fail to remediate material non-conformities.
- Capacity Building: Provide training, tools, and engagement programs to help suppliers improve their environmental, social and governance performance over time.
- ESG-linked Sourcing: Embed environmental, social, and governance criteria in suppliers qualification, selection, performance evaluation and contractual terms, with appropriate weightage for sustainability performance.
- Transparency: Track and publicly disclose key sustainable-procurement performance indicators — including share of critical suppliers assessed on ESG, supplier audit outcomes, local-sourcing share and conflict-mineral due diligence — through annual Sustainability reporting.

Supplier Due Diligence

- Suppliers may be requested to provide information such as ownership, registration details, business activities or supply-chain data for compliance and risk-assessment purposes. Non-submission may affect supplier selection or continuation.

- The methodology to identify critical suppliers is included in “Sustainable procurement Guidelines document”.
- Supplier Assessment: Identified critical suppliers will be assessed on environmental, social, and governance criteria based on covering 75 % of total business volume by 2026.
- Suppliers are required to fully support all due diligence processes and strictly comply with the Supplier Code of Conduct prescribed by TRLK.

Governance Mechanism

The Divisional Head – Procurement is responsible for implementing and monitoring this Policy, driving continuous improvement, designing and executing measures to identify & mitigate risks within their area of responsibility. Progress on key matters and performance updates will be reported periodically to the Management.

Review & Amendment:

The Management shall review the policy on, three-year basis and update as per requirement due to change in law and regulation or any other urgent market conditions and revise the same, to keep the policy updated with necessary legal and internal changes. This Policy shall be made publicly available on the Company’s website.

This Policy shall be effective from **1st June 2026**.


(P. K. Naik)
Managing Director